#### 1.2 Inventory Management Assumptions

Clean Harbors makes the following assumptions concerning the disposal of its hazardous waste inventory:

- (a). The amount of hazardous waste on-site at the time of closure will be equal to the maximum permitted capacity of each waste management unit.
- (b). Based on historical operating data, each tank can be clean of waste and residue without entering the tank.
- (c). A local third party contractor will operate the Clean Harbors facility in order to perform closure.
- (d).  $1 \text{ yd}^3 = 2000 \text{ lbs}$ .
- (e). Liquid drums will be pumped and disposed offsite as bulk waste.
- (f). Empty drums will be sent offsite for recycling. No cost benefits are considered in this estimate.

#### 1.3 Decontamination Assumptions

Clean Harbors makes the following assumptions concerning the decontamination of equipment:

- (a). The forklifts will be cleaned using detergents and/or solvents.
- (b). 500 gallons of contaminated rinseate will be generated during decontamination activities. This liquid will be bulked and sent off-site for disposal.
- (c). One (1) 55-gallon drums of contaminated debris (e.g., PPE, plastic sheeting, etc.) will be generated during equipment decontamination. Each drum will weigh 400 pounds.
- (d). The decontaminated equipment will be sold and/or sent to a scrap metal dealer. No cost benefits from this will be considered.

#### **Analytical costs**

Analyte	Water Cost/Sample (\$)	Soil Cost/ Sample (\$)
12 RCRA Metals	144	144
Volatile Organic Compounds	70	75
Semivolatile	120	150
Organochlorine Pesticides	75	80
Herbicides	95	100
Total	504	549

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#### 2.1 Container and Tank Waste Disposal

TASK	SOURCE FOR QUOTE	QUOTE	TOTAL COST
Characterize, Load, Transport & Dispose Drummed Waste			
Liquid Fuel (52,360 G)	Systech (as bulk liquid)	\$.18/gal	\$9,425
Solid Fuel (635 DM)	Systech (as drums)	\$40.55/DM	\$25,749
Incineration (52,360 G)	WTI (as bulk liquid)	\$1.07/gal	\$56,025
Deepwell (34,925 G)	Texas Molecular	\$.91/gal	\$31,782
Supervisor- 16 manhours	Average contractor rates for area	\$62.50/hour	\$1,000
Pump drums/load drums (labor-32 manhours)	Average contractor rates for area	\$38.00/hour	\$1,216
Safety equipment- 6 man- days		\$100/man/day	\$600
Misc equipment - 2 day		\$600/day	\$1,200
SUBTOTAL			\$126,997
Characterize, Load, Transport & Dispose Tank Waste			
Liquid Fuel (46,628 G)	Systech (as bulk liquid)	\$.18/gal	\$8,393
Incineration (16,955 G)	WTI (as bulk liquid)	\$1.07/gal	\$18,142
Deepwell (21,196 G)	Texas Molecular	\$.91/gal	\$19,288
Supervisor- 8 manhours	Average contractor rates for area	\$62.50/hour	\$500
Pump drums/load drums (labor-16 manhours)	Average contractor rates for area	\$38.00/hour	\$608
Safety equipment- 3 man- days		\$100/man/day	\$300
Misc equipment - 1 day		\$600/day	\$600
SUBTOTAL			\$47,831
TOTAL			\$174,828

#### 2.2 Tank Decontamination

TASK	SOURCE FOR QUOTE	QUOTE	TOTAL COST
<b>Decontaminate 8 Tanks</b>			
Supervisor- 32 manhours	Average contractor rates for area	\$62.50/hour	\$2,000
	Average contractor	\$38.00/hour	\$2,432
labor-64 manhours	rates for area		
Safety equipment- 12 man-days		\$100/man/day	\$1,200
Misc equipment - 4 days		\$600/day	\$2,400
Cleaning supplies			\$80
Analysis – 8 samples		\$504/sample	\$4,032
Deepwell (1,320 G)	Texas Molecular	\$.91/gal	\$1,201
TOTAL			\$10,945

Note: 185 gallons water generated per tank.

#### 2.3 Equipment Decontamination

TASK	SOURCE FOR QUOTE	QUOTE	TOTAL COST
Decontaminate			
Equipment			
Supervisor- 8 manhours	Average contractor rates for area	\$62.50/hour	\$500
	Average contractor	\$38.00/hour	\$608
labor-16 manhours	rates for area		
Safety equipment- 3 man-		\$100/man/day	\$300
days			
Misc equipment - 1 days		\$600/day	\$600
Cleaning supplies			\$80
Analysis – 2 samples		\$504/sample	\$1,008
Deepwell (500 G)	Texas Molecular	\$.91/gal	\$455

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# Clean Harbors Kansas, LLC RCRA Permit Application Section J-A Closure Plan

**Appendix J-B - Closure Cost Estimate** 

Solid Fuel (1 DM)	Systech (as drums)	\$40.55/DM	\$41
TOTAL			\$3,592

#### 2.4 Assessment of Soil

TASK	SOURCE FOR QUOTE	QUOTE	TOTAL COST
Core concrete and sample soil			
	Average contractor	\$38.00/hour	\$3,040
labor-80 manhours	rates for area		
Safety equipment- 10		\$100/man/day	\$1,000
man-days			
Misc equipment - 5 days		\$600/day	\$3,000
Analysis (114 samples)		\$549/sample	\$62,586
TOTAL			\$69,626

#### 2.5 Decontaminate concrete

TASK	SOURCE FOR QUOTE	QUOTE	TOTAL COST
Decontaminate concrete			
Supervisor- 48 manhours	Average contractor rates for area	\$62.50/hour	\$3,000
labor-96 manhours	Average contractor rates for area	\$38.00/hour	\$3,648
Safety equipment- 18 man-days		\$100/man/day	\$1,800
Misc equipment - 56 days		\$600/day	\$3,600

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Analysis (11 samples)		\$504/sample	\$5,544
Deepwell (4,600 G)	Texas Molecular	\$.91/gal	\$4,186
Health Risk Assessment		Lump sum	\$25,000
TOTAL			\$46,778

Notes: Water generated assumed to be RCRA hazardous for disposal cost purposes

#### 2.6 Professional Engineer Certification

TASK	SOURCE FOR QUOTE	QUOTE	TOTAL COST
PE Services			
On site - 40 hours		\$150/hour	\$6,000
Report Preparation – 20 hours		\$150/hour	\$3,000
SUBTOTAL			\$9,000
TOTAL			\$9,000

#### **APPENDIX J-C**

CLOSURE PLAN FOR BUILDINGS B, D, AND J

Appendix J-C Closure Plan for Buildings B, D, and J

Appendix J Closure Plan for Buildings B, D, and J

Appendix J-C Closure Plan for Buildings B, D, and J

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#### **List of Appendices**

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Figure J.3, Hazardous Waste Management Units

Appendix J-C Closure Plan for Buildings B, D, and J

#### **Acronym Table**

Clean Harbors Kansas, LLC (CHK)
Treatment, Storage, or Disposal Facilities (TSDFs)
Title 40 of the Code of Federal Regulations (40 CFR)
Hazardous Waste Management Units (HWMUs)
National Priorities List (NPL)
Potentially Responsible Party (PRP)
Kansas Department of Health and Environment (KDHE)
Toxic Characteristic Leaching Procedure (TCLP)
Container Management Unit (CMU)
Toxic Characteristic Leaching Procedure (TCLP)

Appendix J-C Closure Plan for Buildings B, D, and J

#### J-1 Introduction

This plan describes the activities to be performed at Clean Harbors Kansas, LLC at the time of specific unit closure; it addresses closure of the following units:

Container Management Units – Buildings B, D, and J Tanks – V9, V10, V11, V12, V13, V14, V15A, V15B, V15C, V15D, V16, V17<sup>1</sup>, V26<sup>2</sup> Miscellaneous units – V26<sup>2</sup>, V34, V35

<sup>1</sup>V17 is a permitted hazardous tank that is and always has been used for storage of gasoline as a product.

<sup>2</sup>V26 is a dispersion tank and is permitted as both a tank and a miscellaneous unit. There is only one tank permitted as both.

Clean Harbors Kansas, LLC has determined that the units referenced above are to be "closed. This closure term describes a container management unit, tank and/or miscellaneous unit closure with soil sampling under the concrete containment.

#### J-2 Hazardous Waste Management Units to be Closed

The Clean Harbors Kansas, LLC facility's hazardous waste management units to be closed are summarized in Table J.1, - Clean Harbors Kansas, LLC - Hazardous Waste Management Units, presented in Appendix JC-A, Tables. Specific descriptions of container management units and tank systems are located in Sections D (Container Management) and E (Tank Management) respectively. Miscellaneous units include all remaining units that have not been previously closed. V26 is the former dispersion tank, V34 is the drum washer and V35 is the drum scraper.

All container management units, tanks 9-14, 15a-15d and 16 and miscellaneous units to be closed have been emptied of all waste. Documentation of the cleaning tanks 9-14, 15a-15d and 16 is contained in Appendix C- Invoice for cleaning of tanks9-14, 15a-15d, and 16

#### J-3 Closure Performance Standard

Clean Harbors Kansas, LLC will close each hazardous waste management unit and/or the entire facility in a manner that minimizes the need for further maintenance, and controls, minimizes, or eliminates (to the extent necessary to protect human health and the environment) post-closure escape of hazardous waste, hazardous constituents, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. Closure activities will be performed in a manner that will comply with the closure performance standards as described in 40 CFR 264.111, 264.114 and 264.197.

Clean Harbors Kansas; LLC will meet these performance standards by removing all hazardous waste constituents to acceptable levels (see Section J-4a). All containers, tanks, miscellaneous units, piping, and other ancillary parts to the systems will be closed in one of the following ways:

Appendix J-C Closure Plan for Buildings B, D, and J

- They will be dismantled and disposed as hazardous waste at a RCRA/HSWA permitted offsite disposal facility.
- 2. They will be decontaminated in accordance with the procedures discussed in Section J-4a and disposed at a solid waste landfill.
- 3. They will be decontaminated sufficiently to be salvaged for future use.
  - 4. They will be transferred for use at another RCRA facility.

All permanent structures (e.g., concrete containment systems) will be decontaminated in accordance with the procedures discussed in Section J-4a and maintained in place.

Prior to use,a representative sample of the tap water utilized in the clean up, will be analyzed as a blank for the same parametyers as the closure samples. If KDHE approves the use of this water, corresponding detectable chemicals of concern from compound table in Appendix J-Amay be deducted from the analytical results from each final rinse sample as correction factors (e.g. if tap water sample has 0.1 ug/l 2,4,-D and the rinse water is 0.2 ug/l 2,4,-D, we would subtract 0.1 ug/l from the rinse water and get a final value of 0.1 ug/l 2,4-D) Use of tap water analytical results as correction factors is subject to prior KDHE approval

Analyte	Analytical Method	
27 metal compounds	Various SW846 methods	
Volatile organic compounds	EPA 8260	
Semivolatiles	EPA 8270	
Organochlorine pesticides	EPA 8081/8082	
Herbicides	EPA 8151	

A detail analyte list is contained in Closure Plan for Buildings B, D, and J Appendix A Laboratory Analytical Method Detection Limits (MDL)

All analyses performed to verify that closure performance standards are met shall be performed at a laboratory certified by the state of Kansas for the specific analytical procedures used.

#### J-3a Establishment of Cleanup Standards

At closure, CHK will use Tier 2 risk based standards for residential soil to ground water pathway found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)", 2010 as the closure performance target level standards for rinse water at the site.

#### J-4 Closure Activities

Clean Harbors Kansas, LLC will close the units described in J-1 in accordance with the following procedures.

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- Clean Harbors Kansas, LLC has notified the Kansas Department of Health and Environment (KDHE) or the United States Environmental Protection Agency (USEPA), Region 7, Administrator per this submittal.
- If modifications to this closure plan are desired and have not been previously approved in accordance with 40 CFR 270.42 and 264.112, the modified portions of the plan will not be implemented until approval by KDHE or other authorized agencies has been received.
- 3. Clean Harbors Kansas, LLC will complete closure activities within 180 days after receiving closure plan approval from KDHE, unless an extension has been requested and approved in accordance with 40 CFR 264.113(b).
- Clean Harbors Kansas, LLC will close the facility in accordance with the schedule discussed in Section J-7 and outlined in Table J.3, Closure Activity Schedule - Facility Closure, of this closure plan.
- The container management units will be closed in accordance with Section J-9a of this
  closure plan. The tank and miscellaneous systems will be closed in accordance with
  Section J-9b of this plan.
- 6. All contaminated equipment and structures will be either properly disposed as hazardous waste or decontaminated in accordance with Section J-4a of this closure plan. After decontamination, equipment (such as conveyers) and structures may be salvaged for future use.
- 7. All wastes generated from closure activities will be handled in accordance with Section J-4b of this closure plan.
- 8. The Clean Harbors Kansas, LLC facility does not contain disposal units. All tank systems have secondary containment meeting the requirements of 40 CFR 264.193 (b) through (f). Also, all hazardous wastes and hazardous waste constituents will be removed from the facility during final closure and all structures will be decontaminated in accordance with this closure plan. If clean closure is not achieved, facility will submit a post-closure plan to the regulatory authority.
- Clean Harbors will inform KDHE and EPA two weeks before closure activities are initiated. Confirmation samples (soil, final rinse water) must be collected in the presence of KDHE/EPA personnel and a Kansas Professional Engineer.
- 10. Within 60 days of closure completion, Clean Harbors Kansas, LLC will submit, either by hand delivery or by registered mail, a certification of closure and a closure report, to KDHE and the Regional Administrator of the USEPA, Region 7. The certification will be signed by CHK, as the owner/operator of the facility and by an independent Kansas registered professional engineer attesting that the units were closed in accordance with

Appendix J-C Closure Plan for Buildings B, D, and J

this closure plan.

11. Closure activies will be conducted in accordance with KDHE approved closure-specific work plans, sampling and analysis plans and quality assurance project plans.

#### J-4a Disposal or Decontamination of Equipment and Structures

During closure, all contaminated equipment and structures will be either properly disposed or decontaminated. Activities will be performed in a manner that will comply with the closure performance standards as described in 40 CFR 264.111, 264.114 and 264.197.

#### J-4a(1) Soil

During closure operations, the soil beneath containment systems of all hazardous waste management units will be investigated as follows.

- 1. Each management unit containment area will be mapped with a grid system. A 25' x 25' grid will be used in material storage areas and a 15' x 15' grid will be used in material processing areas. A soil sample will be taken in the center of each grid. If necessary, concrete borings will be done to sample each required location. Additionally, if a crack exists, a sample will be collected under the crack every 10'. (Note: This does not apply to surface cracks) A sample will also be collected under every sump.
- 2. Collect samples at soil interface beneath the concrete surface and below the underlying subgrade rock where rock exists, and analyze using SW-846 standard methods for the parameters identified in Appendix A. Borings for soil samples in non active containment areas will remain open until any additional sampling required by the EPA or KDHE for closure or corrective action purposes at that location has been completed.
- 3. Proper QA/QC procedures will be followed to control the potential loss of VOCs during sampling and transport.
- 4. For closure Soil will be considered clean for closure when results of sample analyses are at or below the Tier 2 risk based standards for non-residential soil pathway or the Residential Soil to Ground Water pathway, whichever is lower, found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)" 2010
- 5. If large areas of soil contamination, in excess of closure standards, are identified, a project specific assessment and cleanup plan will be prepared and submitted

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to the KDHE for approval and subsequent implementation. This will be done in accordance with the permit modification procedures of 40 CFR 270.42. Alternatively, this may be addressed in the site's corrective action program if formally deferred to the corrective action process by the regulatory agencies.

 KDHE can ask for additional soil samples at any location and depths within the regulatory unit, if staining of soil or other indications of contamination are present.

#### J-4a(2) Hazardous Waste Management Units (HWMUs)

Decontamination procedures for hazardous waste management units (i.e., tank systems, miscellaneous units and container storage units) are discussed in the following paragraphs. Specific procedures are outlined based on configuration of the equipment. "Exposed surfaces" are external surfaces and those internal surfaces that are readily scraped, sandblasted, brushed, or swept (i.e., accessible to standard techniques for removal of residual materials).

#### J-4a(2)(a) HWMUs with no internal or complicated external parts

All tank systems, miscellaneous units, container management units, and their associated secondary containment system components and ancillary equipment will be decontaminated as follows (unless the unit has internal and/or complicated external parts exposed to waste).

- 1. Surfaces will be scraped, sandblasted, brushed, or swept to remove all loose or caked residue. Surfaces will then be triple rinsed. The first wash/rinse will be performed with a high-pressure stream of steam or water with suitable detergents or other cleaning additives. The second wash/rinse will be performed using clean water with cleaning additives. Accumulated liquids from the two first washes will be collected and handled in accordance with Section J-4b of this closure plan. The third wash/rinse will be performed with clean (potable) water.
- The equipment will be visually inspected after the triple wash/rinse to assess the presence of visible residue. If necessary, the facility will repeat all, or part, of the above procedures.
- A representative sample will be taken of the rinse water from the final rinse of each hazardous waste management unit. These samples will be analyzed for total concentrations of all constituents identified in J-3. The constituents in J-3 are broken down further by compound in Appendix A – Laboratory Analytical Method Detection Limits (MDL)

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- 4. Prior to use, a representative sample of the tap water utilized in the clean up, will be analyzed as a blank for the same parameters as the closure samples. If KDHE approves the use of this water, corresponding detectable chemicals of concern from compound table in Appendix J-A may be deducted from the analytical results from each final rinse sample as correction factors (e.g. if tap water sample has 0.1 ug/l 2,4,-D and the rinse water is 0.2 ug/l 2,4,-D, we would subtract 0.1ug/l from the rinse water and get a final value of 0.1ug/l 2,4-D) Use of tap water analytical results as correction factors is subject to prior KDHE approval
- 5. A unit will be considered decontaminated when the rinsate sample analysis results are lower than the Tier 2 risk based standards for non- residential ground water found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)", 2010 or the analytical detection level if there is not a corresponding RSK standard.
- 6. If the unit is not decontaminated after performing Steps 1 through 5, the facility will either repeat the above procedures or dismantle the unit for further management and/or disposal at an off-site permitted TSDF as a hazardous waste. Equipment disposed in a landfill will meet the applicable Land Disposal Restriction (LDR) standards of 40 CFR 268.

#### J-4a(2)(b) HWMUs with internal or complicated external parts

Any miscellaneous unit or tank system with external or complicated internal parts exposed to wastes will be decontaminated as follows.

- 1. Exposed surfaces(i.e. building walls, floors) will be scraped, sandblasted, brushed, or swept to remove all loose or caked residue. Surfaces will then be triple rinsed. The first wash/rinse will be performed with a high-pressure stream of steam or water with suitable detergents or other cleaning additives. The second wash/rinse will be performed using clean water with cleaning additives. Accumulated solids and liquids from the two first washes will be handled in accordance with section J.4b of this closure plan. The third wash/rinse will be performed with clean water.
- 2. The equipment will be visually inspected after the triple wash/rinse to assess the presence of visual residue. If necessary the facility will repeat all, or part, of the above procedures.
- 3. If visible contamination remains, go to Step 6 below. If no visible contamination remains, a representative sample will be taken of the rinse water from the final rinse of each hazardous waste management unit. These samples will be analyzed for total concentrations of all constituents identified in J-3. The constituents in J-3 are broken down further by compound in Appendix J-A.

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- 4. Prior to use, a representative sample of the tap water utilized in the cleanup will be analyzed as a blank for the same parameters as the closure samples. If KDHE approves the use of this water, corresponding detectable chemicals of concern from the compound table in Appendix J-A may be deducted from the analytical results from each final rinse sample as correction factors (e.g. if tap water sample has 0.1 μg/l 2,4,-D and the rinse water is 0.2 μg/l 2,4,-D, we would subtract 0.1 μg/l from the rinse water and get a final value of 0.1 μg/l 2,4,-D). Use of tap water analytical results as correction factors is subject to prior KDHE approval.
- 5. A unit will be considered decontaminated when the rinsate sample analysis results are lower than the Tier 2 risk based standards for non-residential ground water found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)", 2010 or the analytical detection level if there is not a corresponding RSK standard.
- If, after performing the above rinsing procedures, the equipment can not be decontaminated, the equipment will be transported by a licensed/permitted hauler to an off-site, permitted TSDF for further treatment or disposal. Equipment disposed in a landfill will meet the applicable Land Disposal Restriction (LDR) standards of 40 CFR 268.

#### J-4a(3) Closure of Miscellaneous Handling Equipment

A wide variety of equipment on site may be used for hazardous waste management. Equipment that has been in contact with hazardous waste will be decontaminated during closure activities. Equipment which may require decontamination during closure includes (but is not limited to) industrial trucks, drum dollies, handcarts, conveyers, augers, and other material transfer equipment, as well as hand tools such as shovels, brushes, scrapers, etc. During facility closure, this equipment may remain on-site in continued service or will be closed in one of the following ways:

- For closure of small equipment (such as hand tools), if visible contamination exists, the equipment will be disposed as hazardous waste at a RCRA/HSWA permitted offsite disposal facility,
- For closure of all equipment (including hand tools), if visible contamination exists, equipment will be decontaminated and disposed at a solid waste landfill. If evidence of contamination exists after decontamination, the equipment will be transported by a permitted/licensed hauler to a permitted RCRA/HSWA off-site TSDF for further treatment or disposal, or
- For closure of all equipment (including hand tools), if visible contamination exists, equipment will be decontaminated sufficiently to be salvaged for future use and potentially transferred for use at another RCRA facility. All decontamination activity will be performed over a portable, disposable decontamination pad (Example: kid swimming pool)

Appendix J-C Closure Plan for Buildings B, D, and J

#### J-4a(3)(a) Decontamination of small miscellaneous handling equipment

All hand tools and equipment without internal or complicated external parts will be decontaminated in accordance with the following procedures.

- Surfaces will be scraped, sandblasted, brushed, or swept to remove all loose or caked residue. Surfaces will then be rinsed with a high-pressure stream of steam or water, possibly with suitable detergents or other cleaning additives, until either all visible contamination is removed, or until further removal is not feasible. All accumulated solids and liquids will be handled in accordance with section J-4b of this closure plan.
- 2. The equipment will be visually inspected for evidence of visible contamination.
- 3. The equipment will be considered decontaminated when no visible evidence of contamination exists.
- 4. If visible evidence of contamination remains and cannot be removed, the equipment will be disposed as a hazardous waste.

# J-4a(3)(b) <u>Decontamination of large miscellaneous handling equipment with no internal or complicated external parts</u>

All large equipment with no internal or complicated external parts will be decontaminated as follows.

- 1. Surfaces will be scraped, sandblasted, brushed, or swept to remove all loose or caked residue. Surfaces will then be triple rinsed. The first wash/rinse will be performed with a high-pressure stream of steam or water with suitable detergents or other cleaning additives. The second wash/rinse will be performed using clean water with cleaning additives. Accumulated solids and liquids from the two first washes will be handled in accordance with section J.4b of this closure plan. The third wash/rinse will be performed with clean water.
- 2. The equipment will be visually inspected after the triple wash/rinse to assess the presence of visual residue. If necessary, the facility will repeat all, or part, of the above procedures.
  - 3. A representative sample will be taken of the rinse water from the final rinse of each hazardous waste management unit. These samples will be analyzed for total concentrations of all constituents identified in J-3. The constituents in J-3 are broken down further by compound in Appendix A Laboratory Analytical Method Detection Limit (MDL)
- 4. Prior to use, a representative sample of the tap water utilized in the clean up, will be February 10, 2012

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analyzed as a blank for the same parameters as the closure samples. If KDHE approves the use of this water, corresponding detectable chemicals of concern from compound table in Appendix J-A may be deducted from the analytical results from each final rinse sample as correction factors (e.g. if tap water sample has 0.1 ug/l 2,4,-D and the rinse water is 0.2 ug/l 2,4,-D, we would subtract 0.1 ug/l from the rinse water and get a final value of 0.1 ug/l 2,4-D) Use of tap water analytical results as correction factors is subject to prior KDHE approval

- 5. Except in cases where the Hazardous Waste Debris Rule applies, the equipment will be considered decontaminated when the rinsate sample analysis results are lower than the Tier 2 risk based standards for non-residential ground water found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)", 2010 or the analytical detection level if there is not a corresponding RSK standard.
- If the unit is not decontaminated after performing Steps 1 through 5, the facility will either repeat the above procedures or dismantle the unit and transport it by a licensed/permitted hauler to an off-site, permitted TSDF for further treatment or disposal.

# J-4a(3)(c) <u>Decontamination of large miscellaneous handling equipment with internal</u> or complicated external parts

All large equipment with internal and/or complicated external parts that contact waste will be decontaminated in accordance with the following procedures.

- Surfaces will be scraped, sandblasted, brushed, or swept to remove all loose or caked residue. Surfaces will then be triple rinsed. The first wash/rinse will be performed with a high-pressure stream of steam or water with suitable detergents or other cleaning additives. The second wash/rinse will be performed using clean water with cleaning additives. Accumulated solids and liquids from the two first washes will be handled in accordance with section J-4b of this closure plan. The third wash/rinse will be performed with clean water.
- The equipment will be visually inspected after the triple wash/rinse to assess the
  presence of visual residue. If necessary the facility will repeat all, or part, of the above
  procedures.
  - 3. If visible contamination remains, go to Step 6 below. If no visible contamination remains, the facility will take a representative sample of the rinse water from the final rinse of each hazardous waste management unit. These samples will be analyzed for total concentrations of all constituents identified in J-3 are broken down further by compound in Appendix A Laboratory Analytical Method Detection Limit (MDL)
    - 4. Prior to use, a representative sample of the tap water utilized in the cleanup will be analyzed as a blank for the same parameters as the closure samples. If KDHE

Appendix J-C Closure Plan for Buildings B, D, and J

approves the use of this water, corresponding detectable chemicals of concern from the compound table in Appendix J-A may be deducted from the analytical results from each final rinse sample as correction factors (e.g. if tap water sample has 0.1  $\mu$ g/l 2,4,-D and the rinse water is 0.2  $\mu$ g/l 2,4,-D, we would subtract 0.1  $\mu$ g/l from the rinse water and get a final value of 0.1  $\mu$ g/l 2,4,-D). Use of tap water analytical results as correction factors is subject to prior KDHE approval.

- 5. A unit will be considered decontaminated when the rinsate sample analysis results are lower than the Tier 2 risk based standards for non-residential ground water found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)", 2010 or the analytical detection level if there is not a corresponding RSK standard.
- 6. If after performing the above rinsing procedures, the equipment can not be decontaminated, the equipment will be transported by a licensed/permitted hauler to an off-site, permitted TSDF for further treatment or disposal. Equipment disposed in a landfill will meet the applicable Land Disposal Restriction (LDR) standards of 40 CFR 268.

#### J-4a(4) Disposal of Cleanup Equipment/Clothing and Residue

- a. All contaminated equipment used during the cleanup that can't be decontaminated, such as shovels, dustpans and brooms, are shipped to approved KDHE/EPA-disposal facilities in DOT-approved containers or decontaminated using the triple wash/rinse method.
- All contaminated clothing, plastic sheets, rags, etc., generated during cleanup that can't be decontaminated, are sent to KDHE/EPA-approved disposal facilities in DOT approved containers.
- c. All hazardous waste residues from the cleanup of areas and equipment will be sent to KDHE/EPA-approved disposal facilities in DOT approved containers.

#### J-4b Hazardous Waste Handling Procedures

All contaminated solids, liquids, sludges, soils, and debris generated by the closure process will be managed in accordance with applicable regulations as site generated solid waste (i.e., Clean Harbors Kansas, LLC is the generator). Generated wastes meeting the definition of "hazardous waste" under 40 CFR 261.3 will be handled in the manner discussed below.

Site-generated hazardous wastes may be stored on-site in containers, existing tanks, or temporary portable tanks prior to treatment or removal from the facility. The wastes may be consolidated on-site in accordance with the facility's RCRA/HSWA permit. A temporary storage area may be developed for storage of these generated wastes, and if so, wastes will be stored in this area for less than ninety days. These wastes will then be transported to a permitted off-site Treatment, Storage, or Disposal Facility (TSDF) by a permitted hazardous waste hauler for

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appropriate disposal or further treatment (e.g. landfill, deep-well injection, incineration, cement kiln, recycling facility).

#### J-5 Maximum Extent of Operations

Table J.1 lists all hazardous waste management units to be closed under this closure plan existing at the Clean Harbors Kansas, LLC facility. This table represents the maximum extent of operations that are currently planned to be closed at this facility.

#### J-6 <u>Maximum Waste Inventory</u>

The units to be closed have been emptied of all waste.

#### J-7 Schedule for Final Closure

Table J.3, Closure Activity Schedule – Facility Closure outlines the anticipated schedule for closing the Clean Harbors Kansas, LLC facility.

During closure, hazardous waste management units may be closed simultaneously or sequentially. Also, a temporary storage area may be developed for storage of wastes which are generated on-site during closure activities, and if so, wastes will be stored in this area for less than ninety days in appropriate containers or temporary tanks.

#### J-7a Expected Year of Closure

Clean Harbors Kansas, LLC intends to conduct this closure within 180 days after approval of this plan by KDHE.

#### J-8 Closure Plan Amendment

Clean Harbors Kansas, LLC maintains a copy of the closure plan at the facility. Clean Harbors Kansas, LLC will submit a written request for approval to change the closure plan, in accordance with 40 CFR 264.112(c) and 40 CFR 270.42, whenever one of the following occurs.

- 1. Changes in operating plans or facility design affect the closure plan.
- 2. Change in the estimated year of final closure (see section J-7a).
- 3. In conducting closure activities, unexpected events occur which affect the closure plan.

This notification will include a copy of the amended closure plan for review or approval by KDHE. It will be submitted at least 60 days prior to the proposed change in facility design or operation or no later than sixty days after an unexpected event has occurred which has affected the closure plan. If an unexpected event occurs during the closure period, Clean Harbors Kansas, LLC will submit the notification or request no later than 30 days after the unexpected event's occurrence.

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#### J-9 Individual Unit Closures

This section details the closure procedures of each individual hazardous waste management unit. During facility closure each hazardous waste management unit will be closed in accordance with this section.

#### J-9a Building B, D, and J Closure

At closure of buildings B, D, and J, all hazardous waste and hazardous waste residues will be removed from the buildings. Remaining containers, liners and bases containing or contaminated with hazardous waste or hazardous waste residues will be either decontaminated or removed.

#### J-9a(1)Process and Unit Description

The building B, D, and J at the Clean Harbors Kansas, LLC facility are used for storing and staging containers of hazardous and non-hazardous wastes. The wastes managed in these areas include liquids, sludges, and solids and are managed in containers of varying sizes. The CHK facility manages containerized waste in container management areas, each roofed and constructed with concrete diking to minimize run-on and run-off. Figure J.3, depicts the location of each Hazardous waste management units at the facility.

#### J-9a(2) Unit Closure Procedures

For the purposes of this closure plan, each building includes the following structures/equipment:

- Containers, drums, pallets, marino bags, etc., and associated hazardous wastes, waste residues and constituents.
- All associated secondary containment structures (concrete pads, curbs, ramps, etc.).
- Associated equipment (e.g., conveyors, etc.).

During closure operations, the soil beneath containment systems of all hazardous waste management units including buildings will be investigated as follows.

- 1. Each management unit containment area will be mapped with a grid system. A 25' x 25' grid will be used in material storage areas and a 15' x 15' grid will be used in material processing areas. A soil sample will be taken in the center of each grid. If necessary, concrete borings will be done to sample each required location. Additionally, if a crack exists, a sample will be collected under the crack every 10'. (Note: This does not apply to surface cracks) A sample will also be collected under every sump.
- Collect samples at soil interface beneath the concrete surface and below the February 10, 2012

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underlying subgrade rock where rock exists. Borings for soil samples in non active containment areas will remain open until any additional sampling required by the EPA or KDHE for closure or corrective action purposes at that location has been completed. These samples will be analyzed using SW-846 standard methods, and will be analyzed for total concentrations of all constituents identified in J-3. The constituents in J-3 are broken down further by compound in Appendix J-A— Laboratory Analytical Method Detection Limit (MDL).

- Proper QA/QC procedures will be followed to control the potential loss of VOCs during sampling and transport.
- 4. Soil will be considered clean for closure when results of sample analyses are at or below the Tier 2 risk based standards for non-residential soil pathway or the Residential Soil to Ground Water pathway, whichever is lower, found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)" 2010

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- 5. If large areas of soil contamination, in excess of closure standards, are identified, a project specific assessment and cleanup plan will be prepared and submitted to the KDHE for approval and subsequent implementation. This will be done in accordance with the permit modification procedures of 40 CFR 270.42. Alternatively, this may be addressed in the site's corrective action program if formally deferred to the corrective action process by the regulatory agencies.
- KDHE can ask for additional soil samples at any location and depths within the regulatory unit, if staining of soil or other indications of contamination are present.

Clean Harbors Kansas, LLC will close building B, D, and J as follows.

- A. If modifications to the closure plan are desired and have not been previously approved in accordance with 40 CFR 270.42 and 264.112, the modified portions of the plan will not be implemented until approval by KDHE or other authorized agencies has been received.
- B. Clean Harbors Kansas, LLC will close the buildings in accordance with the schedule outlined in Table J.3, Closure Activity Schedule and as discussed in Section J-9a(3) of this closure plan.
- C. All contaminated equipment, structures, and secondary containment systems will be:
  - Dismantled and disposed as hazardous waste at a RCRA/HSWA permitted off-site disposal facility, or

Appendix J-C Closure Plan for Buildings B, D, and J

- Decontaminated in accordance with Section J-4a and disposed of at a solid waste landfill, or
- Decontaminated in accordance with Section J-4a and either salvaged for future use or left in place.
- Successfully decontaminated equipment may be transferred to another TSDF for use.
- All wastes generated on-site from closure activities will be handled in accordance with Section J-4b of this closure plan.
- E. Clean Harbors Kansas, LLC will complete closure activities within 180 days after this plan has been approved by KDHE, unless an extension has been requested and approved in accordance with 40 CFR 264.113(b).
- F. The buildings B, D, and J are not disposal units. Also, all hazardous wastes and hazardous waste constituents will be removed from the buildings during closure and all structures will be decontaminated in accordance with this closure plan. If Clean Closure is not achieved, the facility will submit a post-closure plan to the regulatory authority.

#### J-9a(3)Unit Closure Schedule

Table J.3 outlines the anticipated schedule for closure of closure of building B, D, and J at the Clean Harbors Kansas, LLC facility.

#### J-9b Tank System or Miscellaneous Unit Closure

At closure of a tank or tank system or miscellaneous unit, all hazardous waste and hazardous waste residues will be removed from the unit. Tanks, ancillary equipment and miscellaneous units containing or contaminated with hazardous waste or hazardous waste residues will be either decontaminated or removed.

#### J-9b(1) Process and Unit Description

The tanks miscellaneous units used at Clean Harbors Kansas, LLC vary in size. All hazardous waste management units operating under this permit have secondary containment designed, installed, and operated to prevent migration of wastes or accumulated liquid to the environment. These containment systems, consisting of concrete slabs surrounded by concrete walls or dikes of varying height, enable the detection of and collection of releases and accumulated liquids. The concrete containment liner is also maintained free from cracks and gaps.

These units are summarized in Table J.1. In addition, Figure J.3, shows the location of each

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tank or miscellaneous unit to be closed at the facility

#### J-9b(2) Unit Closure Procedures

For the purposes of this closure plan, each tank system or miscellaneous unit includes:

- Tanks and associated hazardous wastes, waste residues and constituents;
- All ancillary equipment including, but not limited to, piping, fittings, flanges, valves, and pumps; and
- All associated secondary containment structures (concrete pads, curbs, ramps, etc.).
   Note: V26, V34 and V35 are in a containment area that will remain in use to provide containment for existing tanks. This containment area is not subject to decontamination per this closure plan.

V17 is permitted as a hazardous waste tank. It is used for gasoline product and has never been used for waste. This tank was inappropriately permitted as a hazardous waste tank. It will be emptied of product and triple washed. After the triple wash process, the tank will be considered decontaminated and will be put back in service to store product.

During closure operations, the soil beneath containment systems of all hazardous waste management units will be investigated as follows.

- 1. Each management unit containment area will be mapped with a grid system. A 25' x 25' grid will be used in material storage areas and a 15' x 15' grid will be used in material processing areas. A soil sample will be taken in the center of each grid. If necessary, concrete borings will be done to sample each required location. Additionally, if a crack exists, a sample will be collected under the crack every 10'. (Note: This does not apply to surface cracks) A sample will also be collected under every sump.
- 2. Collect samples at soil interface beneath the concrete surface and below the underlying subgrade rock where rock exists. and analyze using SW-846 standard methods for the parameters identified in Appendix A. Borings for soil samples in non active containment areas will remain open until any additional sampling required by the EPA or KDHE for closure or corrective action purposes at that location has been completed.
- 3. Proper QA/QC procedures will be followed to control the potential loss of VOCs during sampling and transport.
- 4. For closure, Soil will be considered clean for closure when results of sample

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analyses are at or below the Tier 2 risk based standards for non-residential soil pathway or the Residential Soil to Ground Water pathway, whichever is lower, found in KDHE's guidance document, "Risk Based Standards for Kansas (RSK)" 2010

- 5. If large areas of soil contamination, in excess of closure standards, are identified, a project specific assessment and cleanup plan will be prepared and submitted to the KDHE for approval and subsequent implementation. This will be done in accordance with the permit modification procedures of 40 CFR 270.42. Alternatively, this may be addressed in the site's corrective action program if formally deferred to the corrective action process by the regulatory agencies..
- KDHE can ask for additional soil samples at any location and depths within the regulatory unit, if staining of soil or other indications of contamination are present.

Clean Harbors Kansas, LLC will close building B, D, and J and anytank system or miscellaneous unit contained in thos buildings as follows.

- A. If modifications to the closure plan are desired and have not been previously approved in accordance with 40 CFR 270.42 and 264.112, the modified portions of the plan will not be implemented until approval by KDHE or other authorized agencies has been received.
- B. Clean Harbors Kansas, LLC will close the buildings in accordance with the schedule outlined in Table J.3, Closure Activity Schedule and as discussed in Section J-9a(3) of this closure plan.
- C. All contaminated equipment, structures, and secondary containment systems will be:
  - Dismantled and disposed as hazardous waste at a RCRA/HSWA permitted off-site disposal facility, or
  - Decontaminated in accordance with Section J-4a and disposed of at a solid waste landfill, or
  - 3. Decontaminated in accordance with Section J-4a and either salvaged for future use or left in place.
  - Successfully decontaminated equipment may be transferred to another TSDF for use.

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- D. All wastes generated on-site from closure activities will be handled in accordance with Section J-4b of this closure plan.
- E. Clean Harbors Kansas, LLC will complete closure activities within 180 days after this plan has been approved by KDHE, unless an extension has been requested and approved in accordance with 40 CFR 264.113(b).
- F. The buildings B, D, and J are not disposal units. Also, all hazardous wastes and hazardous waste constituents will be removed from the buildings during closure and all structures will be decontaminated in accordance with this closure plan. Therefore, the buildings B, D, and J are not subject to the post-closure care requirements of 40 CFR 264.116 through 264.120.

The following sequence of work events will be implemented at each tank location:

- Visually inspect the tank location in relation to overhead utilities, adjacent utilities, building load bearing supports, present of contamination and electrical components and make the necessary plans to remove or work around in a safe manner.
- Position the scissors lift below and adjacent to the tank and place personnel and equipment into the scissors lift platform
- Secure/Harness all personnel and equipment a required.
- Lift the necessary manpower and equipment to the top of the tank.
- Remove any non-structural or non building supporting structures which may be impeding the tank removal.
- Open the tank via the man way.
- Monitor the inside gas vapors and implement the necessary purging procedures previous to arc weld cutting.
- Make initial cut into a ¼ section of the tank and secure a hook via the boom
- Continue to cut the ¼ section of the tank until it has separated from the remaining ¾ section of the tank.
- Lower the entire ¼ section of the tank to the ground surface

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- Continue to cut the ¼ section of the tank into manageable piece on the ground surface utilizing the boom as necessary to prevent free falling pieces.
- Continue the above process for the reaming ¾ section of tank removing ¼ section sections a time and lowing to the ground surface.
- When sufficient pieces have accumulated on the ground surface, load the tank pieces onto the flat bed truck with the skid steer/fork lift.
- Dispatch the truck to the local metal recycling facility.
- Maintain accurate records of truck net weights of metal.
- Continue the above process for all inside tanks

#### J-9b(3) <u>Unit Closure Schedule</u>

Table J.3 outlines the anticipated schedule for the closure of a tank/tank system at the Clean Harbors Kansas, LLC facility.

#### J-10 <u>Certification of Closure</u>

Within 60 days of final closure completion, Clean Harbors Kansas, LLC will submit, either by hand delivery or by registered mail, a certification of closure to KDHE and to the Regional Administrator of the USEPA, Region 7 per 40 CFR 264.115. The certification will be signed by CHK, as the owner/operator of the facility and by an independent Kansas registered professional engineer attesting that the units were closed in accordance with this closure plan.

#### J-11 Closure Report

Within 60 days of final closure completion, Clean Harbors Kansas, LLC will submit, either by hand delivery or by registered mail, the Closure report to KDHE and to the Regional Administrator of the USEPA, Region 7. The final closure report will include the following as applicable to each area being closed:

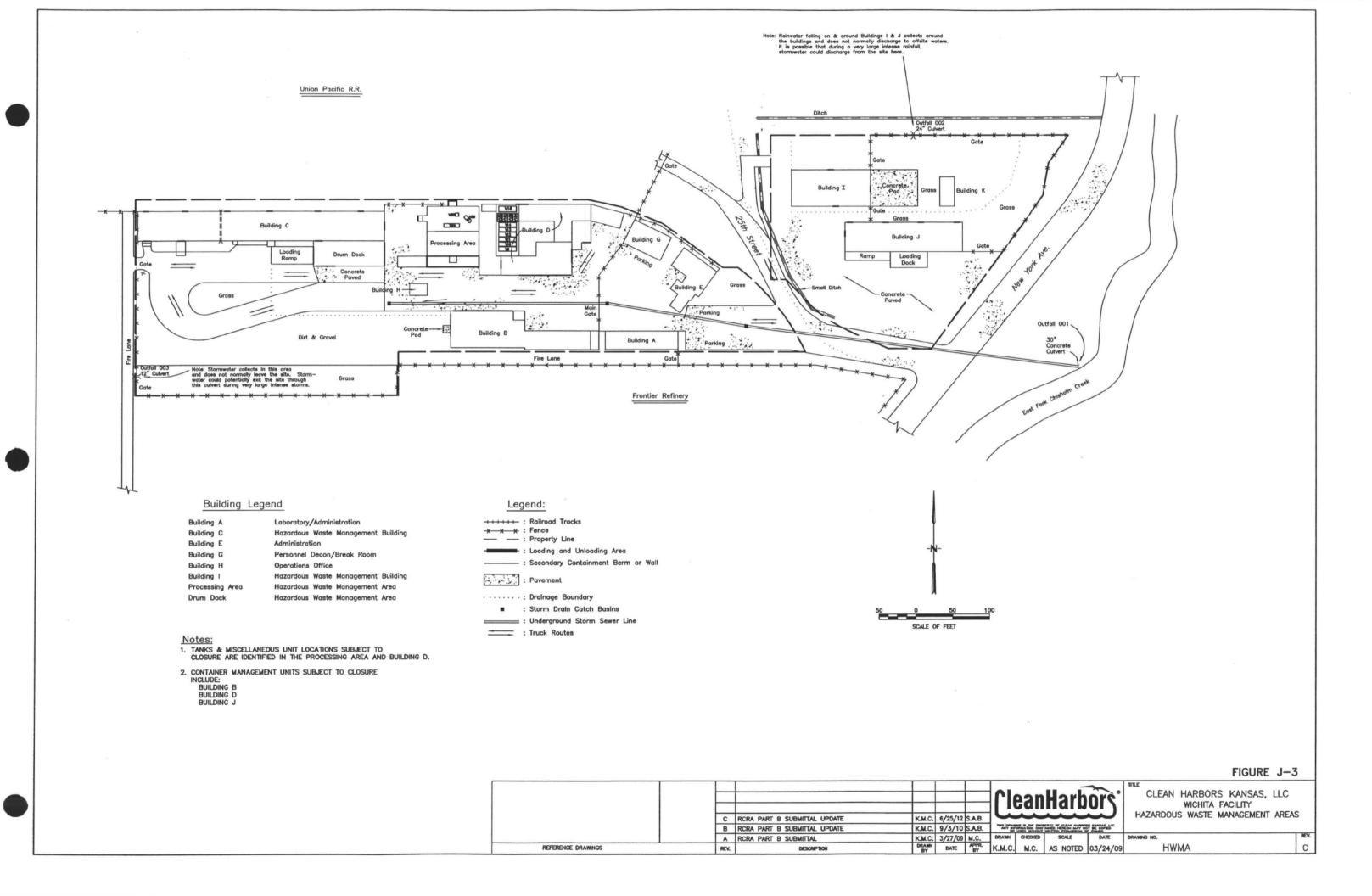
- Site history information;
- A map of the site indicating the location of the units being closed;
- Visual observation made at the time of closure with respect to condition of the units;
- Documentation of the methods used to clean/decontaminate the units;
- Photographs associated with the closure of the units (before, during, and after closure) used in conjunction with written documentation;

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- The volume of waste and waste residue removed, including the waste (residue) resulting from decontamination activities;
- A description of the method of waste handling and transport;
- Waste manifest numbers or copies of manifests from the removal of waste and waste residues;
- A description of the sampling and analytical methods used, including sample preservation and chain of custody methods;
- Laboratory records;
- A narrative description of the closure field tasks performed;
- A chronological field log of closure activities;
- Tests performed and methods:
- Location of the sampling points;
- Results of laboratory analyses, summarized in a tabular format and with the laboratory reports as an appendix;
- Documentation of off-site disposal for any materials taken off-site; and,
- A brief description of the current regulatory status and operations at the site
- A comparison of the results of laboratory analyses with the performance standards for clean closure

#### J-12 Requirements for Kansas Engineer

An independent Kansas registered professional engineer must be present at all sampling events and must also certify the closure report and the closure certification. The engineer must have relative experience with closure operations. The Engineering will have experience similar to the example resume in Appendix B.



# APPENDIX JC-A TABLES

# Appendix J-B Example Engineer Resume

#### **TABLE J-C.1**

#### **EXTENT OF OPERATIONS**

# CLEAN HARBORS KANSAS, LLC - HAZARDOUS WASTE MANAGEMENT UNITS

<u>HWMU</u>	UNIT	Wastes Stored/Function
C C C	Building B Building D Building J	Hazardous waste - Container Management Hazardous waste - Container Management Hazardous waste - Container Management
T T T T T T T T T T T T	V-9 V-10 V-11 V-12 V-13 V-14 V-15A V-15B V-15C V-15D V-16 V-17	Hazardous Waste Liquid
M M M	V-26 V-34 V-35	Hazardous Waste Liquid Hazardous Waste Liquid Hazardous Waste Liquid

Note: V26 is permitted as a tank and a miscellaneous unit. There is only 1 unit permitted both as a tank and miscellaneous unit.

#### TABLE J-C.3

# **CLOSURE ACTIVITY SCHEDULE - FACILITY CLOSURE**

# Calendar Days Lapsed Closure Activity

0	Closure Plan approved by KDHE
120	Complete decontamination of tanks, miscellaneous and container management units. Collect and Analyze rinsate and water samples.
150	Complete dismantling/removal of all generated wastes, temporary storage units, and decontaminated tanks, equipment, and structures (if removal is necessary). Collect and Analyze rinsate and soil samples.
180	Complete final closure activities.
200	Inspection of facility by a Professional Engineer.
240	Submit a certification of closure to KDHE or the EPA Region 7 Administrator.

Clean Harbors Kansas, LLC Section J Closure Plan Appendix J-A - Tables

APPENDIX J-A

**TABLES** 

Product: AB8270STD Semivolatiles

Matrix: AQ Aqueous

Method List: AB8270 AQ Report List: AB8270 ALL

RL/MDL Factor: 1

Method Ref: SW846 8270D

**ABN Full List** 

Compound	CAS No.	RL	MDL Units	Control Limits (%) MS/MSD RPD	Rev: 10/23/10 BS	DUP
Benzoic Acid	65-85-0	50	10 ug/l	10-150	10 10 150	
2-Chlorophenol	95-57-8	5	0.5 ug/l	44-103	40 10-150	40
4-Chloro-3-methyl phenol	59-50-7	5	0.5 ug/l	53-105	29 44-103	29
2,4-Dichlorophenol	120-83-2	5	0.5 ug/l	53-108	24 53-105	24
2,4-Dimethylphenol	105-67-9	5	1.1 ug/l	37-91	26 53-108	26
2,4-Dinitrophenol	51-28-5	25		37-91 37-111	28 37-91	28
4,6-Dinitro-o-cresol	534-52-1	10			30 37-111	30
2-Methylphenol	95-48-7	5		62-115	26 62-115	26
3&4-Methylphenol	00 10 1	5		35-91	30 35-91	30
2-Nitrophenol	88-75-5	5		32-85	29 32-85	29
4-Nitrophenol	100-02-7	25	3	49-111	30 49-111	30
Pentachlorophenol	87-86-5	25		13-55	31 13-55	31
Phenol	108-95-2	5		57-118 13-54	26 57-118	26
2,4,5-Trichlorophenol	95-95-4	5		59-106	34 13-54	34
2,4,6-Trichlorophenol	88-06-2	5		58-107	23 59-106	23
Acenaphthene	83-32-9	5		58-107	24 58-107	24
Acenaphthylene	208-96-8	5			21 58-106	21
Aniline	62-53-3	5		58-105 43-98	21 58-105	21
Anthracene	120-12-7	5	9.	65-108	28 43-98	28
Benzidine	92-87-5	25	3	15-73	19 65-108	19
Benzo(a)anthracene	56-55-3	5	0	63-111	23 15-73	23
Benzo(a)pyrene	50-32-8	5		62-106	19 63-111	19
Benzo(b)fluoranthene	205-99-2	5		63-109	20 62-106	20
Benzo(g,h,i)perylene	191-24-2	5		61-111	20 63-109	20
Benzo(k)fluoranthene	207-08-9	5		64-111	21 61-111	21
4-Bromophenyl phenyl ether	101-55-3	5	3	64-107	20 64-111	20
Butyl benzyl phthalate	85-68-7	5		59-114	20 64-107	20
Benzyl Alcohol	100-51-6	5	3	34-98	20 59-114	20
2-Chloronaphthalene	91-58-7	5	0.5 ug/l		27 34-98	27
4-Chloroaniline	106-47-8	5	0.5 ug/l	54-105 53-103	24 54-105	24
Carbazole	86-74-8	5	0.5 ug/l	66-109	22 53-103	22
Chrysene	218-01-9	5		64-111	20 66-109	20
bis(2-Chloroethoxy)methane	111-91-1	5	3		19 64-111	19
bis(2-Chloroethyl)ether	111-44-4	5	0.54 ug/l	48-101	28 48-101	28
bis(2-Chloroisopropyl)ether	108-60-1	5	0.54 ug/l	51-108	27 51-108	27
4-Chlorophenyl phenyl ether	7005-72-3			43-106	27 43-106	27
1,2-Dichlorobenzene	95-50-1	5	3	61-107	20 61-107	20
1,2-Diphenylhydrazine	122-66-7		3	41-102	28 41-102	28
1,3-Dichlorobenzene	541-73-1	5	0.5 ug/l	61-110	20 61-110	20
1,4-Dichlorobenzene	106-46-7	5	1 ug/l	38-100	28 38-100	28
2,4-Dinitrotoluene	121-14-2	5	1 ug/l	40-100	28 40-100	28
_, / 0.0100110	121-14-2	5	0.5 ug/l	60-109	20 60-109	20

2,6-Dinitrotoluene	606-20-2	5	0.5 ug/l	58-104	21 58-104	21
3,3'-Dichlorobenzidine	91-94-1	10	1 ug/l	57-105	25 57-105	25
Dibenzo(a,h)anthracene	53-70-3	5	0.52 ug/l	62-112	20 62-112	20
Dibenzofuran	132-64-9	5	0.5 ug/l	61-108	20 61-108	20
Di-n-butyl phthalate	84-74-2	5	0.87 ug/l	62-109	20 62-109	20
Di-n-octyl phthalate	117-84-0	5	1.1 ug/l	60-120	24 60-120	24
Diethyl phthalate	84-66-2	5	1.1 ug/l	62-109	19 62-109	19
Dimethyl phthalate	131-11-3	5	0.99 ug/l	63-106	19 63-106	19
bis(2-Ethylhexyl)phthalate	117-81-7	5	1.1 ug/l	59-116	21 59-116	21
Fluoranthene	206-44-0	5	0.5 ug/l	65-114	21 65-114	21
Fluorene	86-73-7	5	0.5 ug/l	61-106	19 61-106	19
Hexachlorobenzene	118-74-1	5	0.56 ug/l	62-107	20 62-107	20
Hexachlorobutadiene	87-68-3	5	1 ug/l	38-107	30 38-107	30
Hexachlorocyclopentadiene	77-47-4	10	1.9 ug/l	19-84	35 19-84	35
Hexachloroethane	67-72-1	5	1 ug/l	35-101	29 35-101	29
Indeno(1,2,3-cd)pyrene	193-39-5	5	0.5 ug/l	61-113	20 61-113	29
Isophorone	78-59-1	5	0.5 ug/l	56-111	26 56-111	26
1-Methylnaphthalene	90-12-0	5	0.5 ug/l	52-102	25 52-102	25
2-Methylnaphthalene	91-57-6	5	0.57 ug/l	56-112	26 56-112	26
2-Nitroaniline	88-74-4	5	0.5 ug/l	60-109	20 60-109	20
3-Nitroaniline	99-09-2	5	0.5 ug/l	52-107	21 52-107	21
4-Nitroaniline	100-01-6	5	0.5 ug/l	59-111	21 59-111	
Naphthalene	91-20-3	5	0.8 ug/l	50-104	28 50-104	21 28
Nitrobenzene	98-95-3	5	0.59 ug/l	52-105	28 52-105	28
N-Nitrosodimethylamine	62-75-9	5	2.4 ug/l	20-71	32 20-71	
N-Nitroso-di-n-propylamine	621-64-7	5	0.5 ug/l	51-104	28 51-104	32
N-Nitrosodiphenylamine	86-30-6	5	1 ug/l	57-110	19 57-110	28
Phenanthrene	85-01-8	5	0.5 ug/l	65-108	20 65-108	19
Pyrene	129-00-0	5	0.5 ug/l	60-113	20 60-113	20
Pyridine	110-86-1	10	1.6 ug/l	15-67		20
1,2,4-Trichlorobenzene	120-82-1	5	0.5 ug/l	45-104	40 15-67	40
			olo ag/i	40-104	28 45-104	28
2-Fluorophenol	367-12-4			Surrogate Limits:	14.60	
Phenol-d5	4165-62-2			Surrogate Limits:	14-62	
2,4,6-Tribromophenol	118-79-6			Surrogate Limits:	Oct-40	
Nitrobenzene-d5	4165-60-0			Surrogate Limits:	33-118	
2-Fluorobiphenyl	321-60-8			Surrogate Limits:	42-108	
Terphenyl-d14	1718-51-0			Surrogate Limits:	40-106	
				ourrogate Limits:	39-121	

72 compounds and 6 surrogates reported in list AB8270

### AB8270STD solid

Compound	CAS No.	RL	MDL	Units	MS/MSD	RPD	BS	DUP	
Benzoic Acid	65-85-0	830	200	ug/kg	44 116		20 44 440		
2-Chlorophenol	95-57-8	170		ug/kg ug/kg	44-116 54-97		36 44-116		36
4-Chloro-3-methyl phenol	59-50-7	170		ug/kg	5 <del>4</del> -97 59-102		31 54-97		31
2,4-Dichlorophenol	120-83-2	170		ug/kg	60-101		27 59-102		27
2,4-Dimethylphenol	105-67-9	170		ug/kg	49-89		30 60-101		30
2,4-Dinitrophenol	51-28-5	830		ug/kg	39-107		31 49-89		31
4,6-Dinitro-o-cresol	534-52-1	330		ug/kg	58-107		40 39-107 37 58-109		40
2-Methylphenol	95-48-7	170		ug/kg	53-94		29 53-94		37
3&4-Methylphenol		170		ug/kg	54-95		31 54-95		29
2-Nitrophenol	88-75-5	170		ug/kg	55-96		30 55-96		31
4-Nitrophenol	100-02-7	830		ug/kg	56-106		29 56-106		30
Pentachlorophenol	87-86-5	830		ug/kg	50-115		33 50-115		29
Phenol	108-95-2	170		ug/kg	55-99		28 55-99		33
2,4,5-Trichlorophenol	95-95-4	170		ug/kg	60-101		28 60-101		28 28
2,4,6-Trichlorophenol	88-06-2	170		ug/kg	60-100		27 60-101		27
Acenaphthene	83-32-9	170		ug/kg	59-97		29 59-97		29
Acenaphthylene	208-96-8	170		ug/kg	58-98		30 58-98		30
Aniline	62-53-3	170		ug/kg	38-92		38 38-92		38
Anthracene	120-12-7	170	17	ug/kg	61-104		29 61-104		29
Benzidine	92-87-5	1700		ug/kg	10-151		50 10-156		20
Benzo(a)anthracene	56-55-3	170		ug/kg	60-106		31 60-106		31
Benzo(a)pyrene	50-32-8	170		ug/kg	59-102		32 59-102		32
Benzo(b)fluoranthene	205-99-2	170		ug/kg	60-107		31 60-107		31
Benzo(g,h,i)perylene	191-24-2	170	120	ug/kg	56-103		32 56-103		32
Benzo(k)fluoranthene	207-08-9	170		ug/kg	61-107		30 61-107		30
4-Bromophenyl phenyl ether	101-55-3	170		ug/kg	60-104		26 60-104		26
Butyl benzyl phthalate Benzyl Alcohol	85-68-7	170		ug/kg	57-110		28 57-110		28
2-Chloronaphthalene	100-51-6	170		ug/kg	51-102		34 51-102		34
4-Chloroaniline	91-58-7	170		ug/kg	57-95		28 57-95		28
Carbazole	106-47-8	170		ug/kg	19-85		34 19-85		34
Chrysene	86-74-8	170		ug/kg	60-106		30 60-106		30
bis(2-Chloroethoxy)methane	218-01-9	170		ug/kg	60-107		31 60-107		31
bis(2-Chloroethyl)ether	111-91-1 111-44-4	170	0.00	ug/kg	51-89		30 51-89		30
bis(2-Chloroisopropyl)ether		170		ug/kg	50-96		33 50-96		33
4-Chlorophenyl phenyl ether	108-60-1 7005-72-3	170		ug/kg	44-94		32 44-94		32
1,2-Dichlorobenzene	95-50-1	170		ug/kg	60-101		26 60-101		26
1,2-Diphenylhydrazine	122-66-7	170		ug/kg	47-91		35 47-91		35
1,3-Dichlorobenzene	541-73-1	170		ug/kg	58-104		27 58-104		27
1,4-Dichlorobenzene	106-46-7	170		ug/kg	45-86		36 45-86		36
2,4-Dinitrotoluene	121-14-2	170 170		ug/kg	45-88		36 45-88		36
2,6-Dinitrotoluene	606-20-2	170		ug/kg	59-103		30 59-103		30
3,3'-Dichlorobenzidine	91-94-1	330		ug/kg	57-99		30 57-99		30
Dibenzo(a,h)anthracene	53-70-3	170		ug/kg	34-88		31 34-88		31
Dibenzofuran	132-64-9			ug/kg	57-105		29 57-105		29
Di-n-butyl phthalate	84-74-2	170 330		ug/kg	58-103		27 58-103		27
Di-n-octyl phthalate	117-84-0			ug/kg	59-105		27 59-105		27
Diethyl phthalate	84-66-2	170 330		ug/kg	59-117		28 59-117		28
	0 <del>1</del> -00-2	330	07	ug/kg	59-106		27 59-106		27

Dimethyl phthalate bis(2-Ethylhexyl)phthalate Fluoranthene	131-11-3 117-81-7 206-44-0	170 330 170	33 ug/kg 67 ug/kg	60-100 57-111	26 60-100 29 57-111	26 29
Fluorene	86-73-7	170	17 ug/kg 17 ug/kg	60-110	32 60-110	32
Hexachlorobenzene	118-74-1	170	17 ug/kg 17 ug/kg	60-99 58-103	30 60-99	30
Hexachlorobutadiene	87-68-3	170	33 ug/kg	49-95	27 58-103	27
Hexachlorocyclopentadiene	77-47-4	170	73 ug/kg	36-94	33 49-95	33
Hexachloroethane	67-72-1	170	33 ug/kg	44-89	41 36-94	41
Indeno(1,2,3-cd)pyrene	193-39-5	170	17 ug/kg	57-104	38 44-89	38
Isophorone	78-59-1	170	17 ug/kg	58-97	33 57-104	33
1-Methylnaphthalene	90-12-0	170	17 ug/kg	55-93	30 58-97 33 55-93	30
2-Methylnaphthalene	91-57-6	170	17 ug/kg	57-103	32 57-103	33
2-Nitroaniline	88-74-4	170	33 ug/kg	53-106	29 53-106	32
3-Nitroaniline	99-09-2	170	33 ug/kg	29-85	31 29-85	29
4-Nitroaniline	100-01-6	170	33 ug/kg	49-104	31 49-104	31
Naphthalene	91-20-3	170	27 ug/kg	54-93	32 54-93	31
Nitrobenzene	98-95-3	170	17 ug/kg	53-92	32 53-92	32
N-Nitrosodimethylamine	62-75-9	330	70 ug/kg	37-88	34 37-88	32
N-Nitroso-di-n-propylamine	621-64-7	170	17 ug/kg	49-94	28 49-94	34
N-Nitrosodiphenylamine	86-30-6	170	17 ug/kg	53-107	28 53-107	28
Phenanthrene	85-01-8	170	17 ug/kg	61-103	32 61-103	28
Pyrene	129-00-0	170	17 ug/kg	58-109	33 58-109	32
Pyridine	110-86-1	330	67 ug/kg	30-68	38 30-68	33
1,2,4-Trichlorobenzene	120-82-1	170	17 ug/kg	52-93	32 52-93	38
			-55	02 00	32 32-93	32
2-Fluorophenol	367-12-4			Surrogate Limits:	40-102	
Phenol-d5	4165-62-2			Surrogate Limits:	41-100	
2,4,6-Tribromophenol	118-79-6			Surrogate Limits:	42-108	
Nitrobenzene-d5	4165-60-0			Surrogate Limits:	40-105	
2-Fluorobiphenyl	321-60-8			Surrogate Limits:	43-107	
Terphenyl-d14	1718-51-0			Surrogate Limits:	45-107	
				- sir oguto Limito.	40-118	

<sup>72</sup> compounds and 6 surrogates reported in list AB8270

Product: P8081PESTTCL Pesticides, TCL

Matrix: SO Solid

Method List: P8081 SO Report List: PTCL ALL

RL/MDL Factor: 0.33

Method Ref: SW846 8081B

Pesticide TCL List

LF17812

LJ1046

DUP

Control Limits (%) Rev: 07/31/08 CAS No. RL MDL Units MS/MSD RPD BS Compound 309-00-2 1.7 0.43 ug/kg 57-118 Aldrin alpha-BHC 319-84-6 1.7 0.36 ug/kg 65-116

27 57-118 27 23 65-116 23 beta-BHC 319-85-7 20 1.7 0.36 ug/kg 63-124 20 63-124 delta-BHC 319-86-8 1.7 0.33 ug/kg 41-127 25 41-127 25 1.7 0.4 ug/kg 22 68-121 22 gamma-BHC (Lindane) 58-89-9 68-121 alpha-Chlordane 5103-71-9 1.7 0.36 ug/kg 69-120 33 69-120 28 gamma-Chlordane 5103-74-2 1.7 0.36 ug/kg 70-123 34 70-123 34 25 Dieldrin 60-57-1 1.7 0.36 ug/kg 69-122 25 69-122 4,4'-DDD 72-54-8 3.3 0.43 ug/kg 63-135 28 63-135 28 3.3 28 4,4'-DDE 72-55-9 0.4 ug/kg 66-127 28 66-127 66-142 4,4'-DDT 50-29-3 3.3 0.43 ug/kg 28 66-142 28 Endrin 72-20-8 3.3 0.4 ug/kg 69-135 24 69-135 24 61-126 Endosulfan sulfate 3.3 25 61-126 25 1031-07-8 0.36 ug/kg Endrin aldehyde 7421-93-4 3.3 0.43 ug/kg 5-113 30 5-113 30 Endrin ketone 53494-70-8 3.3 0.36 ug/kg 64-135 23 64-135 23 Endosulfan-I 959-98-8 1.7 0.33 ug/kg 68-119 20 68-119 20 Endosulfan-II 33213-65-9 1.7 0.33 ug/kg 65-124 19 65-124 19 Heptachlor 76-44-8 1.7 0.4 ug/kg 65-123 26 65-123 26 Heptachlor epoxide 1.7 26 1024-57-3 0.33 ug/kg 69-117 26 69-117 Methoxychlor 72-43-5 3.3 0.66 ug/kg 66-139 23 66-139 23 Toxaphene 8001-35-2 83 33 ug/kg 50-150 30 50-150 30

Tetrachloro-m-xylene 877-09-8 Decachlorobiphenyl 2051-24-3 Surrogate Limits: 46-122 Surrogate Limits: 50-133

<sup>21</sup> compounds and 2 surrogates reported in list PTCL

Product: P8081PESTTCL Pesticides, TCL

Matrix: AQ Aqueous

Method List: P8081 AQ Report List: PTCL ALL

Method Ref: SW846 8081B

Pesticide TCL List

LF17679 LJ1046

RL/MDL Factor: 0.01

					Control Li	mits (%)	Rev: 01/1	6/07	
Compound	CAS No.	RL	MDL	Units	MS/MSD	RPD	BS	DUP	
Aldrin	309-00-2	0.05	0.005	ua/l	72-122	16	72-122		16
alpha-BHC	319-84-6	0.05		-	77-132		77-132		16
beta-BHC	319-85-7	0.05		_					
				-	73-132		73-132		17
delta-BHC	319-86-8	0.05		_	43-127		43-127		30
gamma-BHC (Lindane)		0.05			80-136		80-136		17
alpha-Chlordane	5103-71-9				75-131	16	75-131		16
gamma-Chlordane	5103-74-2			_	79-136	17	79-136		17
Dieldrin	60-57-1	0.05	0.005	ug/l	80-13 <b>6</b>	16	80-136		16
4,4'-DDD	72-54-8	0.1	0.01	ug/l	64-154	25	64-154		25
4,4'-DDE	72-55-9	0.1	0.01	ug/l	65-146	21	65-146		21
4,4'-DDT	50-29-3	0.1	0.01	ug/l	62-143	28	62-143		28
Endrin	72-20-8	0.1		ug/l	75-139	15	75-139		15
Endosulfan sulfate	1031-07-8	0.1		ug/l	62-138	24	62-138		24
Endrin aldehyde	7421-93-4	0.1		l ug/l	5-139	44	5-139		44
Endrin ketone	53494-70-	€ 0.1		l ug/l	76-132	17	76-132		17
Endosulfan-I	959-98-8	0.08		ug/l	72-140		72-140		19
Endosulfan-II	33213-65-	.6 0.08		5 ug/l	75-139		75-139		16
Heptachlor	76-44-8	0.0		5 ug/l	71-143		71-143		15
Heptachlor epoxide	1024-57-3			5 ug/l	78-129		7 78-129		17
Methoxychlor	72-43-5	0.		2 ug/l	63-140		63-140		20
Toxaphene	8001-35-2			1 ug/l	50-150		50-150		20
				. 49/1	00 100	20	00-100		20
Tetrachloro-m-xylene	877-09-8				Surrogate	E Limits:	42-127		
Decachlorobiphenyl	2051-24-3	3			Surrogate		27-127		

<sup>21</sup> compounds and 2 surrogates reported in list PTCL

Product: P8082PCB Polychlorinated Biphenyls

Matrix: SO Solid

Method List: P8082 SO

Method Ref: SW846 8082A

**PCB** List

LF16973 LF2924

Report List: PCB ALL RL/MDL Factor: 0.33

Control Limits (%) Pay: 04/25/07

					Control Lir	nits (%)	Rev: 04	/25/07
Compound	CAS No.	RL	MDL	Units	MS/MSD	RPD	BS	DUP
•								
Aroclor 1016	12674-11-2	17	6.6	ug/kg	69-117	26	69-117	26
Aroclor 1221	11104-28-2	17	8.3	ug/kg	60-140	30	60-140	30
Aroclor 1232	11141-16-5	17	8.3	ug/kg	70-130	30	70-130	30
Aroclor 1242	53469-21-9	17	6.6	ug/kg	70-130	30	70-130	30
Aroclor 1248	12672-29-6	17	6.6	ug/kg	70-130	30	70-130	30
Aroclor 1254	11097-69-1	17	6.6	ug/kg	70-130	30	70-130	30
Aroclor 1260	11096-82-5	17	6.6	ug/kg	71-121	30	71-121	30

Tetrachloro-m- 877-09-8 Decachlorobipt 2051-24-3 Surrogate Limits: 44-126 Surrogate Limits: 39-157

7 compounds and 2 surrogates reported in list PCB

Product: P8082PCB Polychlorinated Biphenyls

Matrix: AQ Aqueous

Method List: P8082 AQ Report List: PCB ALL Method Ref: SW846 8082A

**PCB** List

LF16970

LF2924

RL/MDL Factor: 0.01

					Control Li	mits (%)	Rev	v: 04/25/07	7
Compound	CAS No.	RL	MDL	Units	MS/MSD	RPD		BS	DUP
Aroclor 1016	12674-11-2	0.5	0.2	ug/l	76-117		16	76-117	16
Aroclor 1221	11104-28-2	0.5	0.25	ug/l	60-140		30	60-140	30
Aroclor 1232	11141-16-5	0.5	0.25	ug/l	70-130		30	70-130	30
Aroclor 1242	53469-21-9	0.5	0.2	ug/l	70-130		30	70-130	30
Aroclor 1248	12672-29-6	0.5	0.2	ug/l	70-130		30	70-130	30
Aroclor 1254	11097-69-1	0.5	0.2	ug/l	70-130		30	70-130	30
Aroclor 1260	11096-82-5	0.5	0.2	ug/l	65-117		23	65-117	23
Tetrachloro-m-x	yl 877-09-8				Surrogate	Limits:		38-127	
Decachlorobiphe	er 2051-24-3				Surrogate	Limits:		25-137	

7 compounds and 2 surrogates reported in list PCB

Parm_Syn	Units	DL	LOD	LOQ	Units	DL	LOD	LOQ
Aluminum	ug/l	25	25	200	mg/kg	1.2	1.25	40
Antimony	ug/l	2	2	6	mg/kg	0.1	0.1	10
Arsenic	ug/l	2	2	10	mg/kg	0.1		1
Barium	ug/l	5	5	200	mg/kg	0.5	0.1	0.5
Beryllium	ug/l	1	1	4	mg/kg		0.5	10
Cadmium	ug/l	1	1	5		0.05	0.05	0.25
Calcium	ug/l	100	100	1000	mg/kg	0.05	0.05	0.2
Chromium	ug/l	1	1	10	mg/kg	5	5	250
Cobalt	ug/l	1	1	50	mg/kg	0.05	0.05	0.5
Copper	ug/l	2	2	25	mg/kg	0.05	0.05	2.5
Iron	ug/l	35	50	300	mg/kg	0.1	0.1	1.25
Lead	ug/l	1	1	5	mg/kg	1.7	2.5	15
Magnesium	ug/l	100	100	5000	mg/kg	0.05	0.05	1
Manganese	ug/l	1	1	15	mg/kg	5	5	250
Molybdenum	ug/l	2	2	50	mg/kg	0.05	0.05	0.75
Nickel	ug/l	2	2	40	mg/kg	0.05	0.05	2.5
Potassium	ug/l	500	500	10000	mg/kg	0.05	0.05	2
Selenium	ug/l	2	2	10	mg/kg	25	25	500
Silver	ug/l	1	1	10	mg/kg	0.2	0.2	1
Sodium	ug/l	1900	2000	10000	mg/kg	0.05	0.05	0.5
Strontium	ug/l	1	1		mg/kg	55	100	500
Thallium	ug/l	1.85	2	10	mg/kg	0.05	0.05	0.5
Tin	ug/l	1.03	1	10	mg/kg	0.13	0.25	0.5
Titanium	ug/l	2		50	mg/kg	0.05	0.05	2.5
Vanadium	ug/l	1	2	10	mg/kg	0.1	0.1	0.5
Zinc	ug/l	5		50	mg/kg	0.05	0.05	2.5
2.110	ug/i	Э	5	20	mg/kg	0.25	0.25	1
Mercury (7470/7471)	ug/l	0.071		1	ug/kg	0.0103		0.083

Product: H8151FL Herbicides, Full List

Matrix: AQ Aqueous

Pentachlorophenol

Method List: H8151 AQ

Method Ref: SW846 8151A

Herbicide List

0.1

LF1768 LF1448

30

Report List: HERBFL ALL RL/MDL Factor: 0.01

Control Limits (%) Rev: 12/18/07 Compound CAS No. RL MDL Units MS/MSD RPD BS DUP 2.4-D 94-75-7 1 0.25 ug/l 40-140 30 40-140 30 30 2,4,5-TP (Silvex) 0.036 ug/l 40-140 30 40-140 93-72-1 0.1 0.019 ug/l 30 2,4,5-T 93-76-5 0.1 40-140 30 40-140 Dicamba 1918-00-9 0.1 0.025 ug/l 40-140 30 40-140 30 Dinoseb 30 88-85-7 2 0.5 ug/l 10-140 30 10-140 2.5 30 Dalapon 75-99-0 1 ug/l 20-140 30 20-140 Dichloroprop 120-36-5 1 0.21 ug/l 40-140 30 40-140 30 2,4-DB 94-82-6 1 0.44 ug/l 40-140 30 40-140 30 **MCPP** 100 30 93-65-2 13 ug/l 40-140 30 40-140 **MCPA** 94-74-6 100 19 ug/l 40-140 30 40-140 30

0.021 ug/l

2,4-DCAA 19719-28-9

87-86-5

Surrogate Limits: 40-140

30 40-140

40-140

<sup>11</sup> compounds and 1 surrogates reported in list HERBFL

Product: H8151FL Herbicides, Full List

Matrix: SO Solid

Method List: H8151 SO Report List: HERBFL ALL Method Ref: SW846 8151A

Herbicide List

LF17529

LF1449

RL/MDL Factor: 0.33

				Control Limits (%)	Rev: 12/18/07	
Compound	CAS No.	RL I	MDL Units	MS/MSD RPD	BS	DUP
2,4-D	94-75-7	33	10 ug/kg	40-140	30 40-140	30
2,4,5-TP (Silvex)	93-72-1	3.3	1.1 ug/kg	40-140	30 40-140	30
2,4,5-T	93-76-5	3.3	1.1 ug/kg	40-140	30 40-140	30
Dicamba	1918-00-9	3.3	1.4 ug/kg	40-140	30 40-140	30
Dinoseb	88-85-7	83	17 ug/kg	10-140	30 10-140	30
Dalapon	75-99-0	170	33 ug/kg	20-140	30 20-140	30
Dichloroprop	120-36-5	33	12 ug/kg	40-140	30 40-140	30
2,4-DB	94-82-6	33	10 ug/kg	40-140	30 40-140	30
MCPP	93-65-2	3300	720 ug/kg	40-140	30 40-140	30
MCPA	94-74-6	3300	1000 ug/kg	40-140	30 40-140	30
Pentachlorophenol	87-86-5	3.3	0.78 ug/kg	40-140	30 40-140	30
2,4-DCAA	19719-28-9	)		Surrogate Limits:	40-140	

<sup>11</sup> compounds and 1 surrogates reported in list HERBFL

Product: V8260STD Volatile Organics

Matrix: AQ Aqueous

Nov 22, 2010 03:09 pm

Method List: VAIX826( Method Ref: SW846 8260B The 8260 Sim method will be used 1,4 Dioxane

Report List: V8260 ALL VOA 8260 List

RL/MDL Factor: 1

LF17742

LF3395

				Control Lir	nits (%)	Rev: 10/2	3/10	
Compound CAS No.	RL	MDL	Units	MS/MSD	RPD	BS	D	UP
Acetone 67-64-1	25	10	/1	FO 424				
Acrolein 107-02-8	25 20		ug/l	59-134		14 59-13		14
Acrylonitril 107-13-1	10		ug/l	33-157		21 33-15		21
Benzene 71-43-2	10		ug/l	62-124		13 62-12		13
Bromoben; 108-86-1	1	0.25	ug/l	83-124 83-115		11 83-12		11
Bromochlo 74-97-5	1	0.22		78-112		10 83-11		10
Bromodich 75-27-4	1		ug/l	76-112 76-116		10 78-11		10
Bromoforn 75-25-2	1		ug/l	68-128		10 76-11		10
n-Butylben 104-51-8	1	0.26		84-124		11 68-12		11
sec-Butylb€ 135-98-8	1	0.22		86-127		10 84-12		10
tert-Butylb 98-06-6	1			83-126		10 86-12		10
Chlorobenz 108-90-7	1		ug/l	87-115		10 83-12 9 87-11		10
Chloroetha 75-00-3	2		ug/l	54-166		20 54-16		9
Chloroform 67-66-3	1			85-123		10 85-12		20 10
o-Chloroto 95-49-8	1			84-121		10 83-12		10
p-Chloroto 106-43-4	1		ug/l	84-120		10 84-12		10
2-Chloroet 110-75-8	5		ug/l	63-125		24 63-12		24
Carbon dis: 75-15-0	2		ug/l	67-147		12 67-14		12
Carbon tet 56-23-5	1	0.25	_	74-139		13 74-13		13
1,1-Dichlor 75-34-3	1			82-127		10 82-12		10
1,1-Dichlor 75-35-4	1		1.570	75-133		13 75-13		13
1,1-Dichlor 563-58-6	1			87-127		10 87-12		10
1,2-Dibror 96-12-8	2		ug/l	61-118		15 61-11		15
1,2-Dibror 106-93-4	1	0.37		80-115		10 80-11		10
1,2-Dichlor 107-06-2	1		ug/l	76-122		11 76-12		11
1,2-Dichlor 78-87-5	1	0.25	ug/l	81-120		11 81-12		11
1,3-Dichlor 142-28-9	1	0.2	ug/l	81-113		11 81-11		11
2,2-Dichlor 594-20-7	1	0.44		77-138		12 77-13		12
Dibromoch 124-48-1	1		ug/l	74-116		11 74-11		11
Dichlorodif 75-71-8	2		ug/l	34-158		22 34-15		22
cis-1,2-Dicł 156-59-2	1	0.26		81-114		10 81-11		10
cis-1,3-Dicł 10061-01-	1	0.2	ug/l	83-119		10 83-11		10
m-Dichloro 541-73-1	1		ug/l	86-115		9 86-11		9
o-Dichlorol 95-50-1	1	0.25		85-115		9 85-11		9
p-Dichlorol 106-46-7	1	0.23	ug/l	87-113		10 87-11		10

trans-1,2-D 156-60-5	1	0.35 ug/l	82-126	10 82-126	10
trans-1,3-D 10061-02-6	1	0.2 ug/l	87-123	10 87-123	10
Ethylbenze 100-41-4	1	0.2 ug/l	87-118	10 87-118	10
2-Hexanon 591-78-6	10	4 ug/l	58-125	14 58-125	14
Hexachlorc 87-68-3	2	0.8 ug/l	71-133	12 71-133	12
Isopropylb: 98-82-8	1	0.2 ug/l	87-131	10 87-131	10
p-Isopropy 99-87-6	1	0.21 ug/l	83-125	9 83-125	9
4-Methyl-2 108-10-1	5	2 ug/l	62-125	13 62-125	13
Methyl bro 74-83-9	2	0.5 ug/l	55-151	21 55-151	21
Methyl chli 74-87-3	2	0.5 ug/l	55-173	22 55-173	22
Methylene 74-95-3	2	0.25 ug/l	81-116	10 81-116	10
Methylene 75-09-2	5	2 ug/l	69-125	11 69-125	11
Methyl eth 78-93-3	5	2 ug/l	61-127	13 61-127	13
Methyl Ter 1634-04-4	1	0.34 ug/l	75-116	10 75-116	10
Naphthaler 91-20-3	5	1 ug/l	59-125	15 59-125	15
n-Propylbe 103-65-1	1	0.2 ug/l	86-125	10 86-125	10
Styrene 100-42-5	1	0.2 ug/l	78-118	11 78-118	11
1,1,1,2-Tet 630-20-6	1	0.2 ug/l	81-119	10 81-119	10
1,1,1-Trich  71-55-6	1	0.2 ug/l	79-133	11 79-133	11
1,1,2,2-Tet 79-34-5	1	0.23 ug/l	71-120	11 71-120	11
1,1,2-Trich  79-00-5	1	0.22 ug/l	80-114	11 80-114	11
1,2,3-Trich 87-61-6	1	0.5 ug/l	64-126	16 64-126	16
1,2,3-Trich  96-18-4	2	0.3 ug/l	77-115	12 77-115	12
1,2,4-Trich  120-82-1	1	0.5 ug/l	68-123	11 68-123	11
1,2,4-Trim€ 95-63-6	2	0.27 ug/l	82-120	10 82-120	10
1,3,5-Trim€ 108-67-8	2	0.21 ug/l	83-123	10 83-123	10
Tetrachlor(127-18-4	1	0.25 ug/l	80-131	12 80-131	12
Toluene 108-88-3	1	0.2 ug/l	86-116	10 86-116	10
Trichloroet 79-01-6	1	0.26 ug/l	85-124	10 85-124	10
Trichloroflı 75-69-4	2	0.5 ug/l	66-156	15 66-156	15
Vinyl chlori 75-01-4	1	0.22 ug/l	57-153	22 57-153	22
Vinyl Aceta 108-05-4	10	2 ug/l	38-159	11 38-159	11
m,p-Xylene	2	0.32 ug/l	86-121	10 86-121	10
o-Xylene 95-47-6	1	0.2 ug/l	83-121	10 83-121	10
1,4 dioxane	2	1 ug/kg	82-126	25 82-126	10
Dibromoflu 1868-53-7			Surrogate Limits:	87-116	
1,2-Dichlor 17060-07-0			Surrogate Limits:	76-127	
Toluene-D{ 2037-26-5			Surrogate Limits:	86-112	
4-Bromoflı 460-00-4			Surrogate Limits:	84-120	

<sup>69</sup> compounds and 4 surrogates reported in list V8260

Product: V8260STD Volatile Organics

Matrix: SO Solid Nov 22, 2010 03:09 pm

Method List: VAIX8260 SO Method Ref: SW846 8260B LF17743

The 8260 Sim method will be used 1,4 Dioxane

Report List: V8260 ALL VOA 8260 List LF3395

RL/MDL Factor: 1

					Control Li	mits (%	6) Rev: 10/	/23/10
Compound	CAS No.	RL	MDL	Units	MS/MSD	RPD	BS	DUP
A t	67.64.4							
Acetone	67-64-1			ug/kg	61-144		61-144	
Acrolein	107-02-8			l ug/kg	27-156		27-156	
Acrylonitrile	107-13-1			L ug/kg	55-144		55-144	
Benzene	71-43-2			ug/kg	78-130		78-130	
Bromobenzene	108-86-1			l ug/kg	78-123		78-123	
Bromochloromethane	74-97-5			l ug/kg	72-122		72-122	
Bromodichloromethane				L ug/kg	73-122	25	73-122	
Bromoform	75-25-2			ug/kg	70-139	26	70-139	
n-Butylbenzene	104-51-8			3 ug/kg	80-138	31	80-138	
sec-Butylbenzene	135-98-8			g ug/kg	82-132	29	82-132	
tert-Butylbenzene	98-06-6			2 ug/kg	79-130	29	79-130	
Chlorobenzene	108-90-7		5	L ug/kg	83-122	23	83-122	
Chloroethane	75-00-3		5	2 ug/kg	61-153	31	61-153	
Chloroform	67-66-3		5 1	2 ug/kg	79-129	27	79-129	
o-Chlorotoluene	95-49-8		5 1.3	2 ug/kg	77-123	31	77-123	
p-Chlorotoluene	106-43-4		5 1.3	2 ug/kg	78-129	29	78-129	
2-Chloroethyl vinyl ethe	110-75-8		25 10	ug/kg	52-142	25	52-142	
Carbon disulfide	75-15-0		5	2 ug/kg	61-142	27	61-142	
Carbon tetrachloride	56-23-5		5 1.8	3 ug/kg	79-135		79-135	
1,1-Dichloroethane	75-34-3		5 1.:	l ug/kg	77-132		77-132	
1,1-Dichloroethylene	75-35-4			1 ug/kg	66-132		66-132	
1,1-Dichloropropene	563-58-6			3 ug/kg	81-133		81-133	
1,2-Dibromo-3-chloropr	96-12-8			3 ug/kg	67-129		67-129	
1,2-Dibromoethane	106-93-4			L ug/kg	77-126		77-126	
1,2-Dichloroethane	107-06-2			L ug/kg	78-129		78-129	
1,2-Dichloropropane	78-87-5			2 ug/kg	74-127		74-127	
1,3-Dichloropropane	142-28-9			L ug/kg	78-118		78-118	
2,2-Dichloropropane	594-20-7			ug/kg	80-137		80-137	
Dibromochloromethane				L ug/kg	78-117			
Dichlorodifluoromethan				ug/kg			78-117	
cis-1,2-Dichloroethylene				ug/kg ug/kg	35-162		35-162	
cis-1,3-Dichloropropene		c		_	74-123		74-123	
m-Dichlorobenzene	541-73-1	-		L ug/kg	79-130		79-130	
Dicinorobenzene	247-12-1		5 1.2	2 ug/kg	82-126	29	82-126	

o-Dichlorobenzene	95-50-1	5	1.1 ug/kg	83-123	28 83-123
p-Dichlorobenzene	106-46-7	5	1.1 ug/kg	84-124	28 84-124
trans-1,2-Dichloroethyle	156-60-5	5	1.5 ug/kg	77-129	27 77-129
trans-1,3-Dichloroprope	10061-02-€	5	1.1 ug/kg	87-131	27 87-131
Ethylbenzene	100-41-4	5	1 ug/kg	82-124	25 82-124
2-Hexanone	591-78-6	25	5.4 ug/kg	67-130	29 67-130
Hexachlorobutadiene	87-68-3	5	2 ug/kg	77-150	36 77-150
Isopropylbenzene	98-82-8	5	1.1 ug/kg	82-133	27 82-133
p-Isopropyltoluene	99-87-6	5	1.2 ug/kg	82-132	29 82-132
4-Methyl-2-pentanone	108-10-1	25	5.5 ug/kg	69-125	24 69-125
Methyl bromide	74-83-9	5	2 ug/kg	60-146	31 60-146
Methyl chloride	74-87-3	5	2 ug/kg	58-163	26 58-163
Methylene bromide	74-95-3	5	1.5 ug/kg	75-128	26 75-128
Methylene chloride	75-09-2	10	4.6 ug/kg	62-140	25 62-140
Methyl ethyl ketone	78-93-3	25	6.1 ug/kg	66-134	23 66-134
Methyl Tert Butyl Ether	1634-04-4	5	2 ug/kg	70-131	25 70-131
Naphthalene	91-20-3	5	2 ug/kg	59-143	31 59-143
n-Propylbenzene	103-65-1	5	1.4 ug/kg	78-129	29 78-129
Styrene	100-42-5	5	2.6 ug/kg	79-123	28 79-123
1,1,1,2-Tetrachloroetha	aı 630-20-6	5	1 ug/kg	81-121	25 81-121
1,1,1-Trichloroethane	71-55-6	5	1.1 ug/kg	80-133	27 80-133
1,1,2,2-Tetrachloroetha	ar 79-34-5	5	1.2 ug/kg	70-128	30 70-128
1,1,2-Trichloroethane	79-00-5	5	1.1 ug/kg	76-118	28 76-118
1,2,3-Trichlorobenzene	87-61-6	5	1 ug/kg	78-136	34 78-136
1,2,3-Trichloropropane	96-18-4	5	1.7 ug/kg	74-125	30 74-125
1,2,4-Trichlorobenzene	120-82-1	5	1.2 ug/kg	82-137	32 82-137
1,2,4-Trimethylbenzen	e 95-63-6	5	1.1 ug/kg	77-129	29 77-129
1,3,5-Trimethylbenzen	e 108-67-8	5	1.3 ug/kg	79-129	31 79-129
Tetrachloroethylene	127-18-4	5	1 ug/kg	79-132	27 79-132
Toluene	108-88-3	5	1.2 ug/kg	80-123	26 80-123
Trichloroethylene	79-01-6	5	1.2 ug/kg	78-132	28 78-132
Trichlorofluoromethan	e 75-69-4	5	2 ug/kg	67-149	29 67-149
Vinyl chloride	75-01-4	5	1.5 ug/kg	60-145	29 60-145
Vinyl Acetate	108-05-4	25	14 ug/kg	25-164	35 25-164
m,p-Xylene		10	2.2 ug/kg	82-128	25 82-128
o-Xylene	95-47-6	5	1 ug/kg	82-126	25 82-126
1,4 -Dioxane		2	1 ug/kg	82-126	25 82-126

Dibromofluoromethane 1868-53-7 Surrogate Limits: 80-121 Toluene-D8 2037-26-5 Surrogate Limits: 71-130 4-Bromofluorobenzene 460-00-4 Surrogate Limits: 59-148 1,2-Dichloroethane-D4 17060-07-0 Surrogate Limits: 77-123

69 compounds and 4 surrogates reported in list V8260

Clean Harbors Kansas, LLC Section J Closure Plan Appendix J-A - Tables

> Appendix J-B Example Engineer Resume

# David S. Wilson, P.E., P.G.

Principal





David Wilson is a Principal with ERM based in Salt Lake City, Utah. Mr. Wilson has more than twenty years of experience in environmental and geotechnical engineering. He is experienced in site remediation and waste management, including regulatory compliance audits, due diligence, environmental assessments and site investigations, conceptual and final engineering design, construction, and QA/QC services.

Mr. Wilson has performed feasibility studies, final designs and construction observation services for a variety of environmental remediation projects for waste sites having contaminated sludges, debris, soil, surface water and ground water. He has designed closure systems for hazardous and solid waste sites requiring stabilization, closure by capping, installation of slurry walls, placement of geosynthetic materials, removal of wastes, and ground water contaminant recovery systems.

Mr. Wilson has both U.S. and international experience, including two years in Brazil. He is fluent in English, Spanish and Portuguese. His project work has included RI/FS and RD/RA for CERCLA sites, RFI/CMS for RCRA facilities, and TSCA closures for PCB sites.

#### Publications (Partial List)

- "Remediation and Redevelopment of Historical Metals Smelter Facility Midvale Slag Superfund Site – Operable Unit One Midvale," November 2007, V International Seminar on Remediation and Redevelopment of Contaminated Sites, Sao Paulo, Brazil.
- "USEPA Procedures for Establishing Environmental Screening and Cleanup Levels," April 2007, Panamerican Health Organization, Brasilia, Brazil.
- "Sediment Removal Action Northwest Oil Drain Canal - Salt Lake City, Utah," January 2007, Battelle Sediment Conference, Savannah, Georgia.
- "Brownfield Redevelopment Solutions, Recovering a Communities Hidden Assets" Member of Envision Utah's consulting team for document development, 2006.

#### **Professional Affiliations & Registrations**

- Professional Engineer, 1993
- Professional Geologist, 1993
- · Air & Waste Management Association
- Association of Engineering Geologists
- · Society of American Military Engineers
- Utah Manufacturers Association
- · Utah Mining Association
- Utah Pollution Prevention Association Board
- Rocky Mountain Fabricare Association
- ERM Foundation Board

#### Fields of Competence

- Geotechnical engineering
- · Hydrogeology and groundwater monitoring
- Solid & Hazardous Waste Management
- · Radioactive Waste Management
- · Site Remediation
- Landfill siting and design
- RCRA/TSCA (PCB) Closures and Corrective Action
- Construction QA/QC engineering
- Geoenvironmental engineering
- Applications and geosynthetics design
- Regulatory compliance audits
- Environmental due diligence

#### Education

- M.S., Civil/Geotechnical Engineering, Drexel University, 1993
- B.S., Geological Engineering, University of Utah, 1988
- Utah UST Consultant Registration (since 1996)
- · OSHA 40-hour Certification

#### Languages

- English, native speaker
- · Spanish, fluent
- · Portuguese, fluent



#### **Key Projects**

Directed feasibility study for heavy equipment company to evaluate best technologies for remediation of PCB-contaminated soil. Current work includes preparation of a bench-scale test for ozone-pile chemical oxidation of more than 10,000 drums of affected soil.

Provided engineering and hydrogeological support to a Utah-based LLRW landfill seeking a permit modification to convert part of a NORM cell into a Class A waste cell. Work included responses and engineering revisions to address comments from Utah DRC.

Provided oversight engineering and permitting support to the Skull Valley Band of Goshute Indians on whose land a private company was developing and operating a MSW balefill and C&D waste cell.

Director of sampling and closure certification program for the Coffeyville, Kansas hazardous waste (RCRA/TSCA) incinerator. This work included coordination with the owner, contractor, state regulators and EPA, and laboratory, to document the completion of activities in accordance with the Closure Plan.

Directed and certified the Construction Quality Assurance (CQA) for Cell 14 Closure and Cell 15 Phase 1B Construction at the Lone Mountain Hazardous Waste Landfill in Oklahoma.

Directed decontamination Sampling and Certification of Closure for PCB storage and treatment facility in Kansas City, Missouri for warehouse and tank farm areas.

Provided certification engineering and construction management services during closure of the Clive (Utah) hazardous waste and TSCA (PCB) incinerator, which included development of 14 closure reports for the closed units.

Engineering certification for closure and post-closure cost estimates for three Utah TSD facilities, including: Grassy Mountain Landfill Facility, the Aragonite Incinerator, and remaining Clive waste management operations.

Managed the construction quality assurance services for closure of three landfill cells (industrial and TSCA cells) at the Grassy Mountain hazardous waste landfill facility in Utah. Services included oversight and documentation of all construction activities.

Directed a Needs Assessment for Tooele County, Utah to assess the viability of a second landfill in the county for receipt of low-level nuclear waste and naturally occurring radioactive material (NORM).

Provided consultation and closure oversight for historic PCB transformer areas at Wyoming mining operation under the TSCA self implementation closure program.

Designed and oversaw construction for closure of an industrial, hazardous waste landfill at a chemical plant in Brazil. The landfill closure included waste dewatering, grading, gas venting, clay and synthetic liners, storm water management, and ground water monitoring.

Managed, engineered and directed QA services during closure of various RCRA units, including two mercury sludge impoundments, a drum storage pad, and a carbon tetrachloride storage tank at a Delaware chemical facility.

Provided engineering design and construction phase QA services during installation of a 500-foot long by 20-foot deep ground water recovery trench at a Pennsylvania Superfund Site for recovery and treatment of contaminated ground water.

Developed a Remedial Design Plan and managed the QA services during construction of a remediation project for a New York manufacturing plant for removal of PCBs and volatile organics from surface soils, sediment and shallow ground water.

Provided conceptual and final engineering design, followed by CQA services, for a landfill gas mitigation system to control the release of methane at a former New Jersey landfill located near a shopping center.

Performed an engineering evaluation of a closed hazardous waste landfill at a site in Colorado to determine the cause for cap movement. This study included geotechnical analysis of soil and geosynthetic components in the cap and evaluation of potential slope failure mechanisms.

Engineered a closure design and provided QA consulting services for a hazardous waste disposal site at an Iowa manufacturing facility, which involved installation of slurry walls, a synthetic membrane and asphalt pavement cap, and a gas collection system.

- 09/02/2001 14:31 712-366-5407

## PROPOSAL **EVANS ENVIRONMENTAL CONSTRUCTION** 13585 192ND STREET

COUNCIL BLUFFS, IOWA 51503

TELE: (712) 366-5834 FAX: (712) 366-5407 E-MAIL: evansenv@mcleodusa.net

DATE:

September 7,2001

PROJECT:

AST Cleaning Services, 725 Service Center, Wichita, KS

CLIENT:

Safety Kleen Corp. Rusty Dunn

Ph 316 269-7400 Fx 316 269 7455 Rusty Dunn

EEC ESTIMATOR:

Jeff Evans

SCOPE OF WORK:

Mobilize to site. Primary task will be the cleaning of Tanks V-9, 10,11,12,13,14,15a, 15b, 15c, 15d and 16. All tanks shall be "cold-cut" as necessary to permit entry. EEC will assist Client with sampling if applicable. All rinseates and sludges will be placed in vessels/containers provided by Client. Client shall pay for all disposal and analytical. All work shall be performed in strict compliance with OSHA, NFPA, and API protocol including confined space procedures.

Demobilize.

All EEC employees shall be 40 Hr-Certified for Hazardous Waste Operations per OSHA 1910.120

#### COSTOF WORK:

1. Mobilization/demobilization

1,500.00

2. Total project as described above 17,600.00

SUBMITTED BY ACCEPTANCE: SIGNATURE: res. TITLE:

# Evans Environmental Construction

Phone (712)527-1440 Fax (712) 527-1442 58823 Railroad Avenue Glenwood, IA 51534

## Invoice

Date	Invoice #		
11/15/2001	115996		

RIII	10		

Safety-Kleen Corp.
2549 N. New York
Wichita, KS 67219
Attention:Rusty Dunn

Job Reference

AST Cleaning Services, 725 Service Center, Wichita, KS

P.O. No. Due Date
110029 11/15/2001

Description Amount 1,500.00 1. Mobe/Demobe 17,600.00 2. Cleaning services, as bid **CHANGES IN SCOPE** A. Removed "more than double" quantity of sludge from tapks than specified of CHARGE | Date Royd: 1/2 0.00 NO CHARGE Amount Vendor# G/L Distrib 725 3/L Dietrio 725 COST 3/L Distrib 725 Accrued Total \$19,100.00

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#### **Table of Contents**

List of A	Appendices	.i
List of A	Acronyms	.i
K-1	Financial Assurance:	1
K-2	Insurance Coverage:	2
K-3	Notice in Deed:	3

### **List of Appendices**

Appendix K-A, Financial Assurance Information

Appendix K-B, Certificate of Insurance for Closure or Post Closure Care

Appendix K-C, Hazardous Waste Certificate of Insurance

Appendix K-D, Notice in Deed

### List of Acronyms

Clean Harbors Kansas, LLC (CHK)
Certificate of Insurance for Closure or Post Closure Care (CI)
Treatment, Storage and Disposal (TSD)
Kansas Administrative Regulations (KAR)

K-1 Financial Assurance: 40 CFR 264.143

Clean Harbors Kansas, LLC (CHK) has chosen to use a Certificate of Insurance for Closure or Post Closure Care (CI) to meet facility closure financial assurance requirements. The CI is currently issued by Steadfast Insurance Company of Schaumburg, Illinois.

Appendix K-A, Financial Assurance Information, summarizes facility information, funds assured for closure, and details regarding the CI. The CI is amended annually for inflation as required by 40 CFR 264.142(b) for hazardous waste Treatment, Storage, and Disposal (TSD) facilities operating under a Hazardous Waste Permit. The facility closure cost estimate and corresponding funding instrument will be adjusted on an annual basis for: 1) inflation; and 2) whenever facility changes affecting closure costs occur. A copy of the CI is presented in Appendix K-B, Certificate of Insurance for Closure or Post Closure Care.

One of the options specified in 40 CFR 264.143 paragraphs (a) through (f) must be established to provide financial assurance for closure of a TSD facility. CHK may convert the financial instrument described above to an alternate option specified by federal regulations.

K-2 Insurance Coverage: 40 CFR 264.147

CHK maintains insurance policies to cover general liability, automobile liability, workers compensation, employers' liability and environmental impairment liability (pollution legal liability). The environmental impairment liability includes both sudden and non-sudden pollution coverage. A copy of the Hazardous Waste Facility Certificate of Insurance for accidental occurrences is presented in Appendix K-C, Hazardous Waste Certificate of Insurance.

#### **K-3 Notice in Deed:** 40 CFR 119(b)(1)

In compliance with Kansas Administrative Regulations (KAR) 28-31-8(c) and in anticipation of Post-closure Notices required of TSDFs, CHK has submitted correspondence dated April 16, 1991 regarding property use for hazardous waste management activities to the Registrar of Deeds for Sedgwick County. Copies of these documents are presented in Appendix K-D, Notice in Deed.

Clean Harbors Kansas, LLC RCRA Permit Application Section K Financial Requirements Appendix K-A - Financial Assurance Information

# Appendix K-A

**Financial Assurance Information** 

Clean Harbors Kansas, LLC
RCRA Permit Application
Section K
Financial Requirements
Appendix K-A - Financial Assurance Information

### **Facility Information**

EPA ID NO:

KSD007246846

Facility Name:

Clean Harbors Kansas, LLC

Facility Location:

2549 North New York, Wichita, Kansas 67219

### Certificate of Insurance for Closure or Post Closure Care (CI)

CI Policy Number:

Ex. 4

**Issuing Institution:** 

Steadfast Insurance Company, Schaumburg, IL

**Execution Date:** 

September 6, 2006

Funds Assured:

\$ 1,698,848

#### KANSAS CERTIFICATE OF INSURANCE FOR CLOSURE OR POST-CLOSURE CARE

Name and Address of Insurer (herein called the "Insurer"):

Steadfast Insurance Company 1400 American Lane

Schaumburg, Illinois 60196

Name and Address of Insured (herein called the "Insured"):

Clean Harbors, Inc. 42 Longwater Drive Norwell, MA 02061

**Facilities Covered:** 

EPA Identification No. KSD 981-506-025

Clean Harbors PPM, LLC

2474 Highway 169 North Industrial Park

Coffeyville, KS 67337 Closure Costs: \$2,242,285

Corrective Action Costs: \$2,407,578

BPA Identification No. KSD 007-246-846

Clean Harbors Kansas, LLC 2549 North New York Street

Wichita, KS 67219

Closure Costs: \$1,698,848

Face Amount:

\$6,348,711

Policy Number:

Ex. 4

Effective Date:

September 6, 2006

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e). 265.143(d). and 265.145(d). as applicable and as such regulations were constituted on the date shown immediately

below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Secretary of the Kansas Department of Health and Environment, the Insurer agrees to furnish to the Secretary a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e) as such regulations were constituted on the date shown immediately below.

Chris DeLauder - Regional Vice President

Authorized Representative of:

Steadfast Insurance Company

Administrative Officer

1400 American Lane

Schaumburg, IL 60196-1056

Signature of witness or notary:

Date: 4/2/20

CERTIFICATE HOLDER

Secretary of the Kansas Department of Health & Environment Kansas Department of Health & Environment Bureau of Waste Management 1000 SW Jackson, Suite 320 Topeka, KS 66612 Clean Harbors Kansas, LLC RCRA Permit Application Section K Financial Requirements Appendix K-B - Certificate of Insurance

# Appendix K-B

Certificate of Insurance for Closure or Post Closure Care

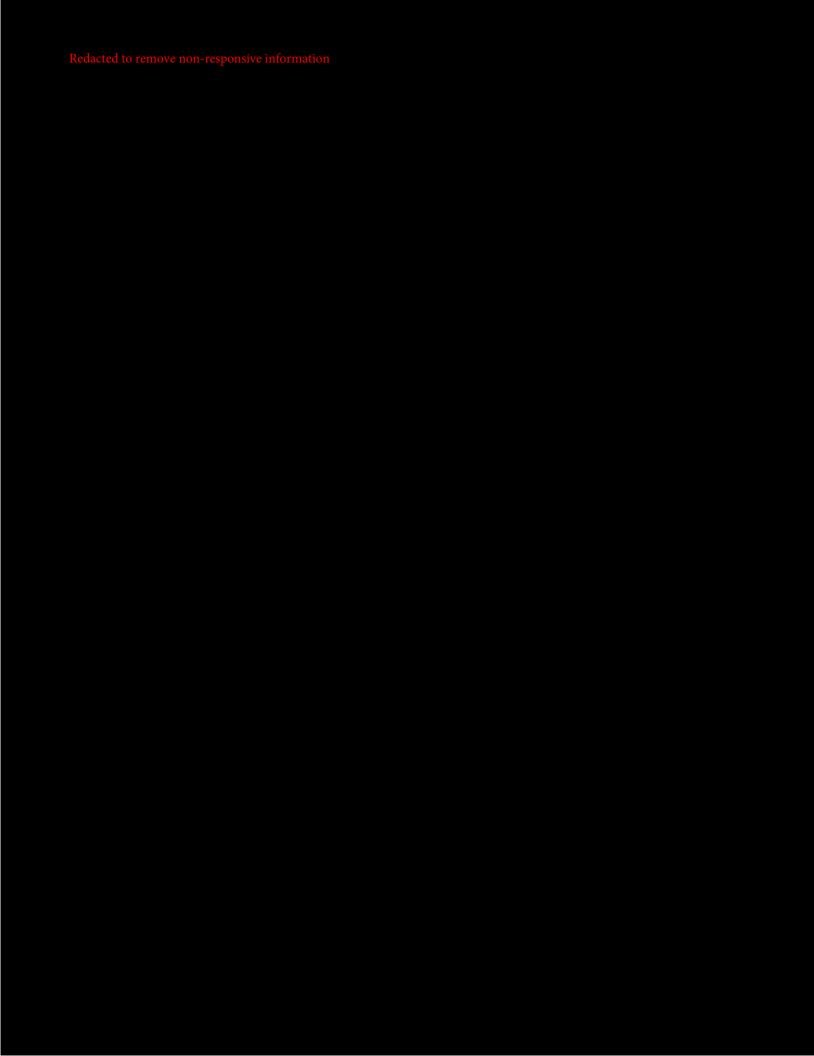
AC	ORD. CERTIFIC	CATE OF LIAB	LITY IN	ISURAN	CE	9/6/06	
PRODUCE William			THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICES BELOW.				
	antic Avenue ·		ALIER THE	COVERAGE AFF	ORDED BY THE POLICE	ES BELOW.	
Boston	, MA 02210		INSURERS AI	FORDING COVE	RAGE	NAIC#	
INSURED	Clean Harbors Environme	ental Services		adfast insuranc	e Company	26387	
	inc. its Subsidiary	OTHER COLUMN	INGURER B:				
	& Affiliated Companies	,	INSURER O:				
	42 Longwater Drive Norw	rell, MA 02061	INSURER 2:				
COVER	AGES						
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LTR ME	TYPE OF INSURANCE	POLICY NUMBER	OLOY EFFECTIVE	DATE GUNDOWY	LIMIT		
	GENERALLIABILITY				EACH OCCURRENCE	8	
	COMMERCIAL GENERAL LIABILITY				PREMARES (Ea occurrence)	\$	
	CLASHS MADE CCUR			[	MED EXP (Anyone person) PERSONAL & ADV INJURY	8	
					GENERAL AGGREGATE	•	
	GEN'L AGGREGATE UNIT APPLIES PER:				PRODUCTS - COMP/OP AGG	8	
	POLICY PRO-						
	ANY AUTO				COMBINED SINGLE LIMIT (Ea sockdard)	\$	
	ALL OWNED AUTOS SCHEDULED AUTOS				(Per person)	\$	
	HIRED AUTOS NON-OWNED AUTOS				BODILY MJURY (Per eccident)	\$	
					PROPERTY DAMAGE (Per accident)	*	
	GARAGE LIABILITY				AUTO ONLY - EAACCIDENT	8	
	ANY AUTO	1			OTHER THAN EAACC	8	
-	EXCESS/UMBRIELLA LIABILITY			<b></b>	EACH OCCURRENCE	8	
	OCCUR GLAIMS MADE				AGGREGATE	\$	
		1		ļ		3	
	DEDUCTIBLE	1		1		\$	
-	RETENTION \$			<del> </del>	WC STATU- CTH	\$	
	ORKERS COMPANSATION AND MPLOYERS' LIABILITY	1		1	EL EACH ACCIDENT	3	
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-	orrective Action	m to deliver liabelia a para pur pur					
DEBGRIPTION OF OPERATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS							
CERTIFICATE HOLDER CANCELLATION							
CEK!	I WALL IIVENER				ED POLICIES SE CANCELLED	BEFORE THE EXPORATION	
				DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAKE DAYS WRITTEN  NOTICE TO THE CERTIFICATE HOLDER BAMED TO THE LEPT, BUT FAILURE TO BO SO SHALL			
			IMPOSE NO COL	JEATION OR LIABILITY	OF ANY KIND UPON THE INSU	RER, ITS AGENTS OR	
1			-	REPRESENTATIVES. AUTHORIZED REPRESENTATIVE			
1		*	COM	D Link			
ACO	RD 25 (2001/08) #S	88105/M88046	- Add	- June	JJH @ ACORD	CORPORATION 1988	

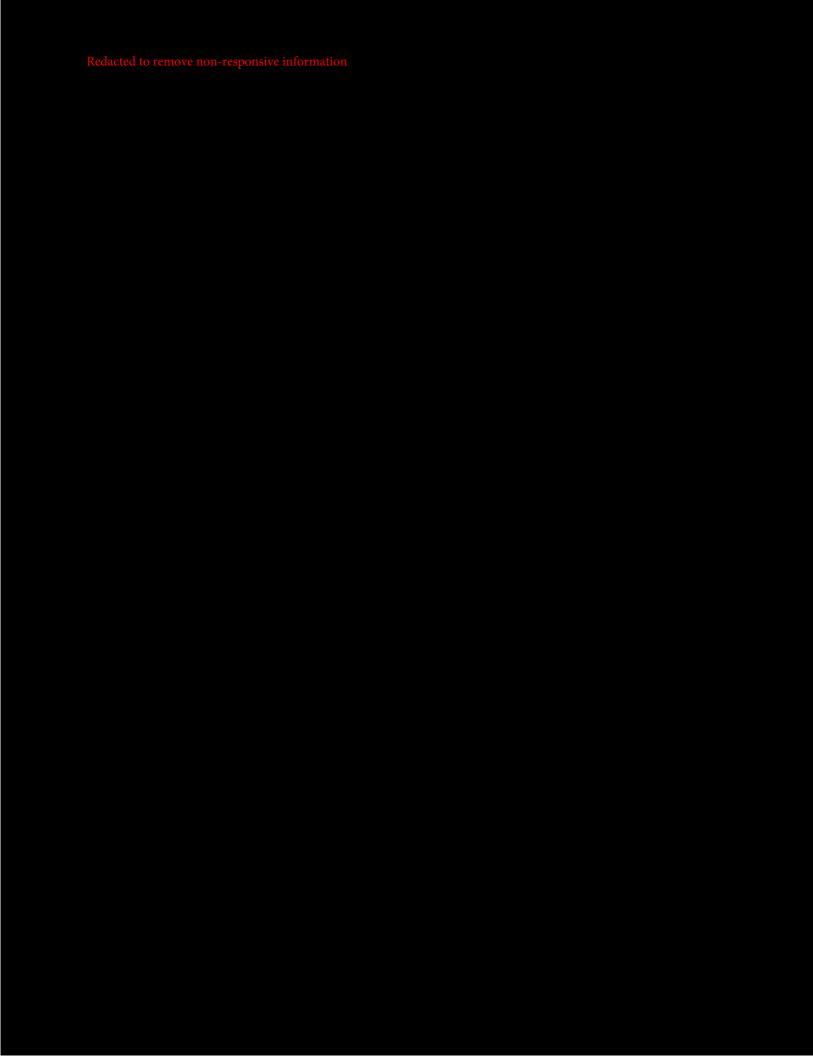
# Certificate of Closure Insurance Attachment A

NSURER:	Steadfast Insurance Company, a Subsidiary of Zurich-American
I SUREK.	Insurance Group (Best's Rating: A XV)
INSURED:	Clean Harbors, Inc. & Subsidiaries
	42 Longwater Drive
	Norwell, MA 02061
POLICY PERIOD:	9/6/06 – 9/06/09
COVERED FACILITIES:	The coverage afforded under this policy applies to the following facilities:

State	Facility	EPA Identification No.	Policy
Redacted t	to remove non-responsive information		
770		V.CD.00704C04C	
KS	Clean Harbors Kansas, LLC 2549 N. New York St., Wichita, KS 67219	KSD007246846 <sub>Ex.</sub>	4

redacted to remove non-responsive information





Clean Harbors Kansas, LLC
RCRA Permit Application
Section K
Financial Requirements
Appendix K-C - Hazardous Waste Certificate of Insurance

# Appendix K-C

**Hazardous Waste Certificate of Insurance** 

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<u>A(</u>	CORD" CERTIF	CATE O	ĒŲ	ABI		NSTRANG		Date: 4/29/08
PRODUCER  Willis North America, Inc. 26 Century Blvd Nashville, TN 37214				THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.				
2180			INSU	RERS A	FFORDING	COVERAGE		NAIC#
INSUR	ED n Harbors Environmental Serv	rices, inc.	INSUI	RER A	Zurich A	merican Insuranc	e Company	16535-002
and i	ts affiliates ongwater Drive		INSUI	RER B	America	n Guarantee and l	Liability Insurance	26247-003
	rell, MA 02061		INSU	RER C	Steadfas	t Insurance Comp	any	26387
			-	RER D				
COV	ERAGES		INSU	RER E	L			
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CO	TYPE OF INSURANCE	POLICY NUMBE		POLICY	EFFECTIVE MAUDD/YY)	POLICY EXPIRATION DATE (MM/DD/YY	LIMITS	
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	X XCU						PERSONAL & ADV INJURY	\$2,000,000
	X Contractual  GEN'L AGGREGATE LIMIT APPLIES PER:						PRODUCTS-COMP/OP AGG	\$3,000,000 \$2,000,000
	POLICY V PRO- LO						TAODOCIS-CONA/OF AGG	\$2,000,000
A	AUTOMOBILE LIABILITY  X ANY AUTO			11/	1/2007	11/1/2008	COMBINED SINGLE LIMIT	\$5,000,000
	ALL OWNED AUTOS SCHEDULED AUTOS HIRED AUTOS	Ex. 4					BODILY INJURY (Per person)	\$
	NON-OWNED AUTOS X MCS-90						BODILY INJURY (Per accident)	\$
	GARAGE LIABILITY						PROPERTY DAMAGE  AUTO ONLY - EA	\$
	ANY AUTO						ACCIDENT OTHER THAN AUTO ONLY	\$
							EACH ACCIDENT	\$
							AGGREGATE	\$
В	X OCCUR CLAIMS MADE			11/	1/2007	11/1/2008	AGGREGATE	\$10,000,000 \$10,000,000
	DEDUCTIBLE	Ex. 4						\$
A	RETENTION S WORKERS COMPENSATION AND			111	1/2007	11/1/2008	WC STATU- OTH TORY LIMITS ER	I
"	EMPLOYERS' LIABILITY ANY	Ex. 4		'"	.,		EL EACH ACCIDENT  EL DISEASE-EA	\$ 2,000,000
	PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe onder SPECIAL PROVISIONS below						E.L. DISEASE-POLICY LIMIT	\$ 2,000,000 \$ 2,000,000
С	OTHER Contractors Pollution Liability	Ex. 4		11/	1/2007	11/1/2008	\$10,000,000 \$10,000,000	Each Claim All Claims
С	DESCRIPTION OF OPERATIONS/LO Environmental Impairment Li	CATIONS/VEHICLI						
CER	TIFICATE HOLDER				CANCELLAT	ION		
			***************************************	T			BED POLICIES BE CANCELL	ED BEFORE THE

For Reference Purposes Only

EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL

30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Clean Harbors Kansas, LLC RCRA Permit Application Section K Financial Requirements Appendix K-D - Notice in Deed

Appendix K-D

**Notice in Deed** 

Sedgwick County Courthouse 4th Floor Registrar of Deeds 525 N. Main Wichita, Ks. 67203

4/16/91

Dear Registrar of Deeds

This letter serves as official owner notification for the property at 2549 N. New York Ave., HRI operated property.

North Industrial Park Fourth Addition,

block 2, lot 1

. Key Number 87-0- -B-1 3826-012583-6703

This is in accordance with Kansas environmental regulation K.A.R. 28-31-8c. This property has been used to manage hazardous waste and all records regarding permits, closure or both are available for review at the Kansas Department of Health and Environment offices in Topeka.

I Court Limber

David Trombold Vice President Associated Chemical, Inc.

MONICA D. BORDEN  Notary Public - State of Kasses  My Appt. Expires 2 -16-94					
Monica D. Borde 9-13-91	~				

For an acknowledgment in a reprsentative capacity:

State of Hansas
(County) of Lidgwick

This instrument was acknowledged before me on

Listender 13, 1991

by Anna Zamardal
as New President
of Associated Themsel, One.

Monica D. Bordes
(Signature of notarial officer)

Title ( and Rank:)

4/16/91

Sedgwick County Courthouse 4th Floor Registrar of Deeds 525 N. Main Wichita, Ks. 67203

Dear Registrar of Deeds

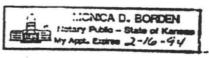
This letter serves as official owner notification for the property at 2549 N. New York Ave., HRI operated property.

North Industrial Park Fourth Addition,

		Key Number
block 1,	lot 2	89-0B-13819-060842-6703
	lot 3	89-0B-13820-026393-6703
	lot 4	89-0B-13821-026394-6703.
	lot 5	89-0B-13822-026395-6703

This is in accordance with Kansas environmental regulation K.A.R. 28-31-8c This property has been used to manage hazardous waste and ll records regarding permits, closure or both are available for review at the Kansas Department of Health and Environment offices in Topeka.

Sand Trombold



Monico D. Borden

For an acknowledgment in a representative capacity:

State of Kansas

(County) of Lidamich

This instrument was acknowledged before me on

September 13, 1991

by Canad Inambold

as 1'el President

of Associated Chemical, One.

(Signature of notarial officer)

Title\_(and\_Rank)

## Clean Harbors Kansas, LLC RCRA Permit Application Section L Solid Waste Management Units and Corrective Action

#### **Table of Contents**

List o	of Figures	Page ii
	of Appendices	
Acro	nym table	Page ii
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	L-1a Description of Solid Waste Management Units:	Page 2
L-2	Information Pertaining to Releases:	Page 3
L-3	Superfund Activities	Page 4

Clean Harbors Kansas, LLC
RCRA Permit Application
Section L
Solid Waste Management Units and Corrective Action
List of Figures

Figure L.1, Location of SWMUs, AOCs, and OAs -

### **List of Appendices**

Appendix L-A, RCRA Facility Investigation report Appendix L-B, SWMU, AOC, OA Appendix L-C RFI Addendum

#### **Acronym Table**

Solid Waste Management Unit (SWMU) Clean Harbors Kansas, LLC (CHK) Kansas Administrative Regulations (KAR) United States Environmental Protection Agency (USEPA) Clean Harbors Kansas, LLC
RCRA Permit Application
Section L
Solid Waste Management Units and Corrective Action

#### L-1 Information Requirements for Solid Waste Management Units: 40 CFR 270.14(d)

The purpose of this section is to provide information regarding the Solid Waste Management Unit (SWMU)s at the Clean Harbors Kansas, LLC facility located in Wichita, Kansas. This section is provided to fulfill the requirements of the Kansas Administrative Regulations (KAR), Title 28, Article 31 and 40 CFR Part 270. Article 31, Hazardous Waste Management Standards and Regulations, of the KAR incorporates, with few additions, the RCRA regulations contained in 40 CFR Parts 260 through 270. Therefore, this section will refer only to the federal regulations. A copy of the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of the Clean Harbors Kansas, LLC facility (the facility) is located in Appendix L-A. The site was formerly owned by Safety-Kleen (Wichita), Inc. The subject site is located at 2549 New York Avenue, in an industrialized area of Wichita. The RFI report was originally submitted to the United States Environmental Protection Agency (USEPA) and the Kansas Department of Health and Environment (KDHE) on January 20, 2003. The revised RFI report was submitted in October 2004. An RFI Addendum was submitted to the agencies on August 29, 2005 and additional amended text for inclusion in the RFI was submitted on January 20, 2006. The RFI and RFI Addendum were approved with comment by the EPA on April 28, 2006. Clean Harbors Kansas continues to work with KDHE and USEPA as part of

> February 10, 2012 Revision No. 15

Clean Harbors Kansas, LLC RCRA Permit Application Section L Solid Waste Management Units and Corrective Action

the on-going corrective action program.

L-1a Description of Solid Waste Management Units: 40 CFR 270.14(d)(1)

Type, Location and Description of the SWMUs:

Appendix L-B lists the location and general description of all SWMU located on site. In addition, Figure L-1 illustrates the location of each SWMU within the facility as required by 40 CFR 270(b)(19). Waste characterization information is contained inside the excerpt in appendix L-A.

Dates of Operation:

CHK is an existing waste management facility. However, the site has been used for other business purposes by companies which have sequentially located at the site for some forty years. The industrial district of the area developed over the past 95 years. The history of hazardous waste operations under EPA ID No. KSD007246846 began in 1979 with Reid Supply Co., Inc. Conservation Services, Inc. purchased certain assets, including the permit (e.g., from Reid Supply Co. in 1986. Subsequently, Hydrocarbon Recyclers, Inc. (HRI), a subsidiary of U.S. Pollution Control, Inc. (USPCI), acquired Conservation Services, Inc. in 1988. USPCI was owned by Union Pacific Corporation

February 10, 2012 Revision No. 15 from 1988 through 1994. Laidlaw Environmental Services (LES) purchased USPCI in 1995; LES changed the name to Safety-Kleen (SK) Inc. after acquiring SK in 1998. Effective September 7, 2002, Clean Harbors, Inc. purchased from Safety-Kleen Services, Inc. the Wichita site

#### Description of Wastes:

The CHK facility stores, treats, and recovers for recycling hazardous and nonhazardous wastes. The types of wastes managed in the RCRA regulated SWMUs are identified in Sections A (Part A Application) and C (Waste Characterization). The sampling and analysis provisions for managing these waste types are provided in Appendix C-A (Waste Analysis Plan) of Section C.

## L-2 Information Pertaining to Releases: 40 CFR 270.14(d)(2)

CHK is not aware of any releases of hazardous waste or hazardous waste constituents from regulated units within the facility. Therefore, the information required under 40 CFR 270.14(d)(2) is not available (i.e., 40 CFR 270.14(d)(2) is not applicable).

February 10, 2012 Revision No. 15 Clean Harbors Kansas, LLC RCRA Permit Application Section L Solid Waste Management Units and Corrective Action

A site inspection for the purpose of identifying potential SWMUs was completed by B. & V. Waste Science and Technology Corporation under contract Number 68-W9-0006 to United States Environmental Protection Agency (USEPA) Region VII in 1990

# L-3 Superfund Activities

The CHK facility is located within the area identified as the North Industrial corridor

.Environmental Response, Compensation, and Liability Act or "Superfund" site in the Wichita

North Industrial District. The facility RFI report is attached as Appendix L-A

